



PERFORMANCE AUDIT • REPORT NUMBER 23-08 • JANUARY 2024

Homelessness Spending

Requested Information on Programs and Services

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DOAA
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Why we did this review

Senate Bill 62, which passed during the 2023 legislative session, required the state auditor to conduct a performance audit of spending on homeless programs and services.

This audit determined: (1) the funds available from federal, state, and local fund sources to spend on homeless programs and services; (2) how funds for homeless programs and services were spent; (3) the extent to which grants and contracts were effectively used to award homeless funds and monitor service delivery; and (4) the extent to which the Georgia Homeless Management Information System assists in improving homeless service delivery.

About Homeless Programs

The Department of Community Affairs (DCA) and other state entities administer a variety of homeless programs. Some are federally funded programs that target specific populations.

As of 2022, approximately 10,700 individuals were reported as experiencing homelessness in Georgia. In 2022, 52% of individuals in the state experiencing homelessness were sleeping outside, in cars, and/or in other places not meant for human habitation (unsheltered).

Homelessness Spending

Requested Information on Programs and Services

What we found

In Georgia, homelessness is addressed through a network of programs and services administered at the state and local levels but primarily funded through federal grants. The majority of these federal grants can be spent over multiple years, depending on the grant period. State funding is significantly smaller for a few targeted programs. Most federal and state funding ultimately reaches the state's network of local organizations that provide direct services to the homeless population. Though a significant amount of activity occurs locally, Georgia's response to homelessness may be improved through statewide coordination.

Significant federal funds are awarded for and spent on homeless programs and services.

Between federal fiscal years 2018 and 2022 (the latest year for which complete federal data was available), an estimated \$706 million in federal funds was available to state agencies, local governments, and service providers to address homelessness. This equated to approximately \$141 million in funds available to spend per year, though funds were higher in fiscal year 2020 due to additional funding related to the COVID-19 pandemic. Approximately 78% (\$549 million) of federal funds available during the period reviewed has been spent.

Approximately 40% of federal funds available (\$279 million) were for state agencies. The Department of Community Affairs had the largest portion (70%, or more than \$192 million). Based on federal data and information reported by the agencies, state recipients have expended approximately 85% of federal funds (\$239 million), leaving \$41 million for future spending.

Approximately 60% of federal funds available were for local governments and service providers (\$214 million and \$213 million, respectively). Most of these funds were available to spend in areas with substantial homeless populations. Based

on federal data and information reported by the recipients, local governments and service providers have spent approximately 73% of federal funds (\$310 million), leaving approximately \$117 million for future spending.

Because state and local governments often serve as pass-through entities, most federal funding in Georgia is ultimately spent by nonprofit and for-profit service providers. These providers spent \$352 million in total, with four entities serving Metro Atlanta spending more than \$10 million each.

State funds accounted for a small portion of total spending during the period reviewed.

Between state fiscal years 2018 and 2023, the state spent \$158 million on homeless programs and services. Annual amounts fluctuated—ranging from \$23 million in fiscal year 2020 to \$29 million in fiscal year 2023. Expenditures were primarily incurred by two state agencies:

- **Department of Behavioral Health and Developmental Disabilities (DBHDD)** – In the period reviewed, DBHDD spent \$123 million (or approximately \$20 million per year) on the Georgia Housing Voucher and Bridge Funding Program. The program provides housing vouchers and start-up rental assistance to individuals experiencing homelessness who have been diagnosed with severe and persistent mental illness.
- **Department of Community Affairs (DCA)** – Approximately \$17 million (\$3 million per year) was spent for the State Housing Trust Fund, which supports organizations that provide housing and other services to individuals experiencing homelessness. DCA (along with the Department of Community Supervision) also helps manage the Re-Entry Partnership Housing Program (RPH), which provides housing for work-ready felons who could be released from custody but remain in prison due to a lack of housing. Of the \$9 million spent on RPH (\$1.5 million per year), approximately \$5 million was from state appropriations.

The state lacks a coordinated response to homelessness.

While a significant amount of funding is dedicated to activities and services related to homelessness, operations are decentralized, and management is primarily concentrated at the local level with no state-level entity designated to coordinate efforts across all regions. Such an entity has been recommended by the United States Interagency Council on Homelessness and implemented by 33 states and the District of Columbia.

Currently DCA is considered the housing agency for the state, though its responsibilities primarily relate to administering federal and state funding. Other states with a designated lead entity have adopted broad strategies for preventing and addressing homelessness. This includes developing strategic plans; fostering collaboration among the various state, local, and third-party stakeholders; and working to target resources toward best practice interventions. Additionally, statewide leadership has encouraged the collection, aggregation, and analysis of data on homelessness trends and service delivery outcomes (the Georgia Homeless Management Information System—HMIS—is not used for such statewide analysis despite having information on demographics and services received).

What we recommend

We recommend the General Assembly consider establishing a statewide council, should it desire a more coordinated approach to address homelessness.

See [Appendix A](#) for a detailed listing of findings and recommendations.

DCA's Response: *DCA responded to findings in the report that were relevant to its operations, which included Findings 1 through 4 and 7 through 9. DCA agreed or partially agreed with the findings. DCA agreed that the state “relies primarily on federal funding sources and a committed network of local service providers to deliver homelessness services,” though it noted it did not replicate DOAA’s methodology and therefore could not substantiate the amounts included in the report.*

DCA stated that the increase in the state’s homeless population in 2022 was “due in large part to the impact of the COVID-19 pandemic.” In addition, DCA noted that housing affordability is a challenge in the state and “the lack of affordable housing options creates cascading pressure that results in increasing cases of homelessness.”

DCA noted that it “looks forward to executing state funding priorities related to homeless prevention and assistance.” DCA also expressed its commitment to “continued coordination, formal or informal, with state agencies and local providers.”

Specific responses are included at the end of each relevant finding.

Table of Contents

Purpose of the Audit	1
Background	1
Findings and Recommendations	11
Finding 1: Between federal fiscal years 2018 and 2022, an estimated \$706.3 million in federal funds was available for homeless programs and services.	11
Finding 2: Approximately 78% of federal funds available has been spent on homelessness programs and services.	16
Finding 3: As the final recipients of federal funding, service providers spent approximately \$352.4 million to directly serve homeless populations between fiscal years 2018 and 2022.	21
Finding 4: Expenditures of state funds for homeless programs fluctuated between fiscal years 2018 and 2023.	24
Finding 5: Most local government survey respondents reported they did not spend their own funds on homelessness programs in 2022.	28
Finding 6: Law enforcement agencies do not track expenditures but reported performing certain activities to address homelessness during their normal duties.	31
Finding 7: The state’s grant administration process is primarily based on federal requirements.	34
Finding 8: While CoCs and service providers use HMIS to meet HUD requirements, its use to improve homeless service delivery statewide is not currently maximized.	38
Finding 9: While a significant amount of funding is used to serve Georgia’s homeless populations, the state lacks a coordinated, strategic response to address the problem.	44
Appendices	
Appendix A: Table of Findings and Recommendations	49
Appendix B: Objectives, Scope, and Methodology	50
Appendix C: Counties With Substantial Homeless Populations (2022)	55
Appendix D: Federal Agencies Administering Homeless Programs	56
Appendix E: Catalog of Federal Domestic Assistance (CFDA) Award Programs Included in this Audit	57

Purpose of the Audit

This review was conducted at the request of the General Assembly. Senate Bill 62—effective July 1, 2023—required a performance audit of federal, state, and local expenditures for homeless programs and services in the state, including expenditures by state and local law enforcement agencies. The bill also required a review of the state’s process for awarding contracts and grants for homeless programs and services, whether performance metrics are met, and the use of the Georgia Homeless Management Information System. Based on these requirements, we address the following questions:

1. What funds were available from federal, state, and local fund sources to spend on homeless programs and services?
2. How were funds for homeless programs and services spent?
3. To what extent have grants and contracts been effectively used to award homeless funds and monitor service delivery?
4. To what extent does the Georgia Homeless Management Information System assist in improving homeless service delivery?

A description of the objectives, scope, and methodology used in this audit is included in [Appendix B](#). A draft of the report was provided to the Department of Community Affairs for its review, and pertinent responses were incorporated into the report.

Background

O.C.G.A. § 8-3-301 defines “homeless” as “persons and families who have no access to or can reasonably be expected not to have access to either traditional or permanent housing that can be considered safe, sanitary, decent, and affordable.” It should be noted that, for the purposes of federal funding, other definitions of homeless exist.¹

In Georgia, homelessness is addressed through a network of programs and services administered at the state and local levels but primarily funded through federal grants.

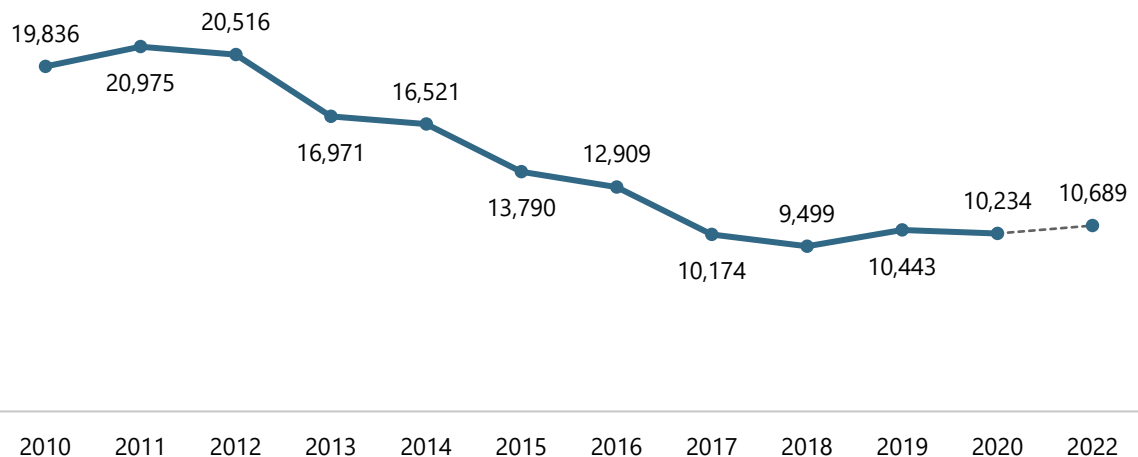
Homelessness in Georgia

As shown in **Exhibit 1**, the reported number of individuals experiencing homelessness in Georgia declined by approximately 46%, from more than 19,800 in 2010 to approximately 10,700 in 2022. While the number generally declined until 2018, it then increased slightly from 2019 to 2022. This is based on Point-in-Time counts of sheltered and unsheltered people on a single night in January, collected per federal requirements (see text box on page 3).

Nationally, the median rate of homelessness is 10.7 per 10,000 people. In Georgia, the rate is 9.9.

¹ Federal programs may define “homeless” differently. For example, the U.S. Department of Housing and Urban Development (HUD) defines “homelessness” as lacking a fixed, regular, and adequate nighttime residence. Unlike HUD, the U.S. Department of Education considers children who are “doubled-up,” meaning they are staying with family or friends, to be homeless.

Exhibit 1
The Reported Number of Individuals Experiencing Homelessness in Georgia Generally Declined from 2010 to 2022¹



¹ A complete count of unsheltered individuals experiencing homelessness was not conducted in 2021 due to the COVID-19 pandemic. Therefore, 2021 data is not included in this exhibit.

Source: U.S. Department of Housing and Urban Development data

During most years, at least half of individuals in the state experiencing homelessness were sheltered, meaning they resided in an emergency shelter or transitional housing that served as a temporary living arrangement (see **Exhibit 2**). In recent years, however, the percentage of unsheltered² homeless has increased. In 2022, 52% were unsheltered—an increase of 11 percentage points from 2020 and the highest percentage since 2012 (59%).

Georgia's homeless population also contains various subpopulations. Individuals with severe mental illness and/or substance abuse disorders represented 32% of the total population in 2022. Other subpopulations represented include individuals from a family with children (26%), victims of domestic violence (8%), veterans (6%), and unaccompanied youth aged 24 or younger (4%).³ Each subpopulation's share of total population decreased from 2011 to 2022, with the exception of individuals from a family with children, which rose slightly.

² Individuals experiencing homelessness who are unsheltered have a primary nighttime residence that is a public or private place not designed for or ordinarily used as regular sleeping accommodation for human beings, including cars, parks, abandoned buildings, bus or train stations, airports, or camping grounds.

³ The percentages reported represent the share of the total homeless population in Georgia that identifies as part of each subpopulation group. Individuals may be counted in more than one of these groups, and the percentages will not total to 100%.

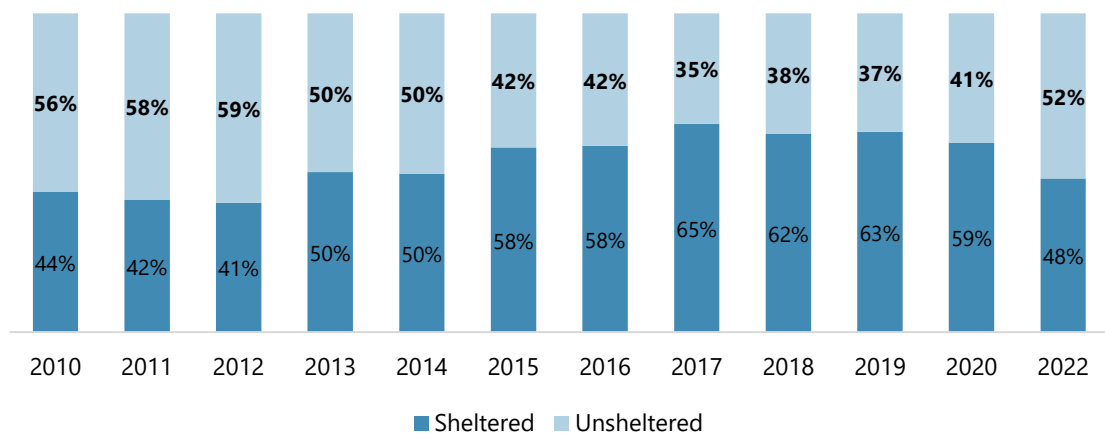
Point-In-Time Counts for Individuals Experiencing Homelessness

The U.S. Department of Housing and Urban Development (HUD) requires Continuums of Care (CoCs) to conduct a Point-in-Time (PIT) count, which is a count of sheltered and unsheltered people experiencing homelessness on a single night in January. As discussed on page 4, CoCs are regional or local planning bodies that coordinate housing and services funding for the homeless. The PIT count consists of an annual count of people temporarily housed in emergency shelters, transitional housing, and Safe Havens (supportive housing for hard-to-reach homeless persons with severe mental illness), as well as a biennial count of unsheltered people.

It should be noted that other individuals experiencing homelessness, such as those staying with family or friends, are not included in these counts but are considered homeless under HUD's definition. Numbers related to these individuals are not documented.

Exhibit 2

In Most Years, the Majority of Individuals Experiencing Homelessness in Georgia Were Sheltered (2010-2022)¹



¹ A complete count of unsheltered individuals experiencing homelessness was not conducted in 2021 due to the COVID-19 pandemic. Therefore, 2021 data is not included in this exhibit.

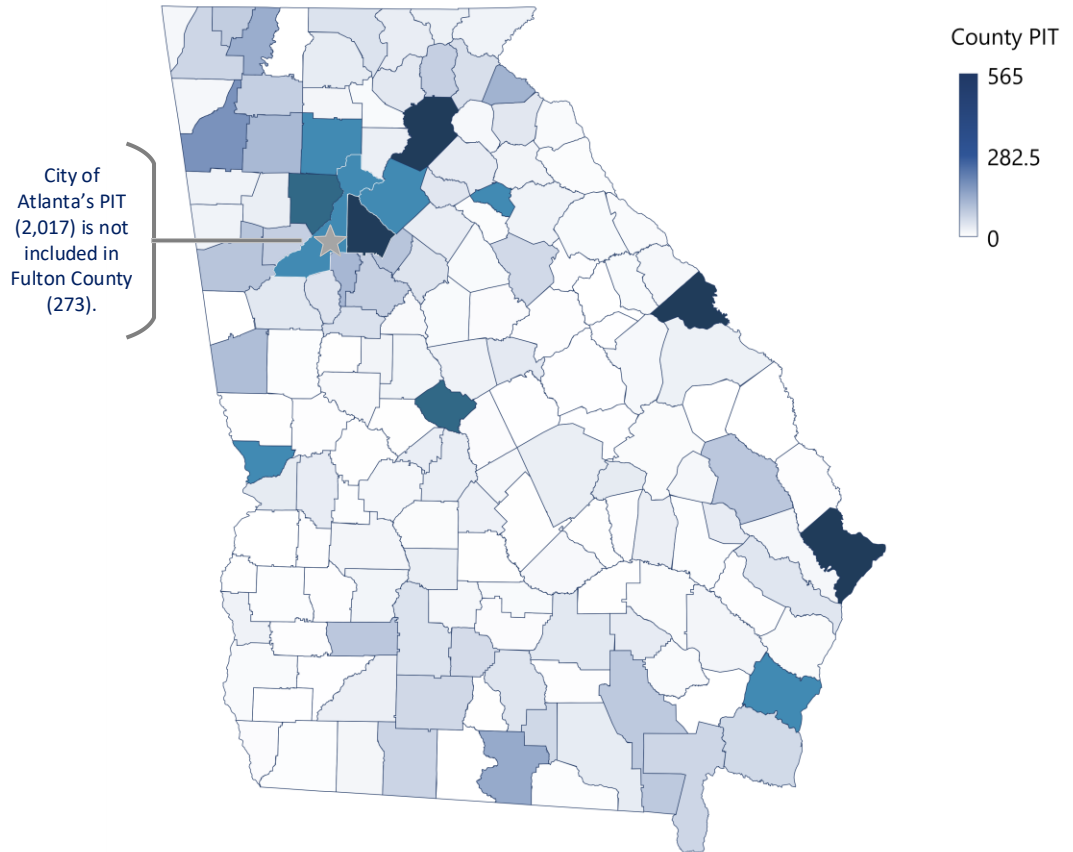
Source: U.S. Department of Housing and Urban Development data

For purposes of this review, we define areas with substantial homeless populations as counties with 100 or more homeless people reported.

In 2022, the majority of individuals experiencing homelessness in Georgia were located in metro areas (see **Exhibit 3**), with the largest percentage concentrated in the City of Atlanta and surrounding counties. Specifically, 17 metro area counties had substantial homeless populations (see **Appendix C** for a full list of counties with substantial populations). In more rural areas of the state—including Clay, Treutlen, Clinch, and Charlton counties—the number of homeless individuals per 10,000 people was comparatively high, although the total number of individuals was significantly less than in metro areas.

Exhibit 3

Counties with Substantial Homeless Populations Were Concentrated Around Metro Areas (2022)



Source: 2022 PIT Count

Federal Entities

The federal government provides a significant amount of funds to states through a variety of programs, several of which are directly related to addressing homelessness. While the U.S. Department of Housing and Urban Development (HUD) provides the majority of the funding, other federal agencies also fund programs designed to provide access to housing and other services, including education, healthcare, and employment services (see [Appendix D](#) for a list of relevant federal agencies). A list of the federal programs that provide these services and are included in this review can be found in [Appendix E](#).

HUD and the Continuum of Care

HUD administers several homeless assistance grants, the largest of which is the Continuum of Care Program. According to federal regulations, the program promotes community-wide efforts to end homelessness and provides funding for nonprofit providers and state and local governments to quickly house homeless individuals or assist them in other ways.

The program is carried out by a network of nonprofit service providers and local governments within a particular geographic area, known as a Continuum of Care (CoC). According to HUD, in addition to nonprofits and local governments, CoCs should also include representatives from a variety of stakeholder groups, including veterans service organizations, homeless and formerly homeless persons, and affordable housing developers.

Each CoC designates one organization to serve as the collaborative applicant, or lead agency, to perform its administrative responsibilities.⁴ As shown in **Exhibit 4**, CoCs typically cover one county and are led by units of local government or private nonprofits. However, one CoC (known as the “Balance of State”) covers the 152 counties not covered by the other eight CoCs and is led by the Georgia Department of Community Affairs (DCA).⁵ CoCs are generally located in counties with substantial homeless populations.

Exhibit 4

Georgia has Nine CoC Geographic Areas

CoC	Lead Agency	Counties
Atlanta	Nonprofit	0 ¹
Athens-Clarke County	Local government	1
Augusta-Richmond County	Local government	1
Columbus-Muscogee County ²	Nonprofit	1
Dekalb County	Local government	1
Fulton County	Local government	1
Marietta/Cobb County	Nonprofit	1
Savannah/Chatham County	Nonprofit	1
Balance of State	State agency	152

¹ The Atlanta CoC’s coverage area includes the City of Atlanta; thus, it does not cover an entire county.
² This CoC also serves Russell County, Alabama.

Source: U.S. HUD documents

⁴ These responsibilities include submitting CoC registration, preparing the CoC’s consolidated application for project funding (which includes a priority list), and submitting the funding application on behalf of the entire CoC during the annual program competition. A CoC may assign other duties to the lead agency as designated in its governance charter.

⁵ The Balance of State consists of 152 predominantly rural counties and covers approximately 96% of the state’s geography. The Balance of State includes 12 counties that were reported as having 100 or more individuals experiencing homelessness in 2022. These counties are Bartow, Bibb, Cherokee, Clayton, Floyd, Glynn, Gwinnett, Hall, Lowndes, Stephens, Troup, and Whitfield.

As discussed below, CoCs are required to establish and operate a coordinated entry system and a Homeless Management Information System (HMIS).

Coordinated Entry

HUD requires each CoC to establish and operate a coordinated entry process to increase the efficiency of crisis response systems in their geographic area and improve ease of access to resources, including housing and other supportive services. Each CoC has several access points that are intended to comprehensively assess needs and match clients with the appropriate services—regardless of their location within the CoC’s geographic area. This eliminates the need for clients to visit multiple service providers to obtain needed services.



A room at Parker’s House, an emergency shelter for women operated by Union Mission, Inc. Union Mission receives CoC funding and participates in HMIS.

Georgia Homeless Management Information System

In 2001, Congress directed HUD to provide data and analysis on the extent and nature of homelessness and on the effectiveness of McKinney-Vento Act programs.⁶ In response, HUD began providing technical assistance and funding for communities to collect data systematically in local Homeless Management Information Systems (HMIS). These systems collect client-level data (e.g., name, date of birth, gender) and data on the provision of housing and services to homeless individuals and families, as well as persons at risk of homelessness.

Each CoC lead agency is responsible for selecting an HMIS software solution that complies with HUD’s data collection, management, and reporting standards. In Georgia, there are two separately maintained HMIS versions. Eight of the nine CoCs have elected to use the version that is managed by DCA. The remaining CoC (Columbus) maintains its own HMIS.

Providers funded by HUD or federal agencies, as well as some locally funded, are generally required to enter data into the HMIS for their respective projects as a condition of receiving funding. However, some CoCs indicated they encourage all service providers to use HMIS on a voluntary basis regardless of their funding sources.

State Entities

DCA and four other state entities share responsibility for administering a variety of federal and state homeless programs.

DCA serves as the state’s lead agency for local government assistance, safe and affordable housing, and community and economic development. As shown in **Exhibit 5**, DCA administers several federal and state programs that address homelessness through the provision of housing and supportive services. These programs are discussed in more detail in Findings 2 and 4 and [Appendix D](#).

⁶ Homeless assistance programs authorized under the McKinney-Vento Homeless Assistance Act include the Emergency Solutions Grant and Continuum of Care Grant.

Exhibit 5 DCA Administers Several Federal and State Programs and Functions that Address Homelessness¹

HOMELESS PROGRAMS AND FUNCTIONS BY FUNDING TYPE	
FEDERAL	
<ul style="list-style-type: none"> • Continuum of Care • Emergency Solutions Grant • Georgia Housing & Finance Authority Permanent Supportive Housing • Homeless Management Information System • Housing Opportunities for Persons With AIDS 	
STATE	
<ul style="list-style-type: none"> • State Housing Trust Fund for the Homeless • Re-Entry Partnership Housing Program² 	

¹ Other DCA programs that may address homelessness include the Georgia Rental Assistance, Housing Voucher, and HUD Section 811 Project Rental Assistance programs. These are not included in this review because participants do not have to be homeless to be eligible.

² DCA administers RPH in collaboration with other state entities.

Source: DCA documents

As discussed below, DCA staff perform various functions to support homeless programs.



The kitchen in a transitional living facility for youth operated by Safe Harbor, Inc. Located in Brunswick, Safe Harbor operates within the Balance of State jurisdiction led by DCA.

- **Grant administration** – Staff in DCA’s Housing Assistance Division are responsible for overseeing grants and contracts with service provider organizations. This includes reviewing grant applications, selecting and training recipients, providing technical assistance, and reviewing grantee expense reports prior to issuing reimbursements. Staff also monitor contracts, prepare and submit required reports, and coordinate with other state entities responsible for serving homeless populations.
- **Balance of State CoC** – As the lead agency for the Balance of State CoC, DCA staff are responsible for organizing the Coordinated Entry system, completing the annual CoC application for funding, conducting the biennial PIT Count, and providing training and technical assistance to their providers. DCA staff also conduct CoC membership recruitment campaigns, assist with CoC board meetings, and ensure members meet HUD requirements.
- **Georgia HMIS** – DCA serves as the HMIS Lead Agency for eight of the state’s nine CoCs. Responsibilities include maintaining compliance with HUD data quality standards, ensuring required HUD reports are accurate and submitted, providing technical support and training to HMIS users, and developing implementation policies and procedures. Additionally, DCA staff work with HMIS vendor staff to meet CoC data needs (e.g.,

running customized reports). As the lead agency, DCA also serves as the chair of the HMIS Steering Committee, which meets monthly to discuss policy updates, new challenges, and best practices.

DCA's commissioner also serves as the executive director of the Georgia Housing and Finance Authority (GHFA), an independent proprietary entity that finances affordable housing development and administers federal and state funding for DCA's housing and homelessness programs. GHFA also manages the State Housing Trust Fund for the Homeless, which provides grants to nonprofit organizations and local governments to operate emergency shelters, transitional housing, and essential services (e.g., wraparound supportive services and case management). GHFA operations merged with DCA in 1996; while it is an independent entity, all staff performing GHFA functions are DCA employees.

In addition to DCA, other state agencies administer programs to provide housing and support services for individuals experiencing homelessness. Some are federally funded programs that target specific population groups (e.g., youth, veterans, persons with disabilities).

- **Department of Behavioral Health and Developmental Disabilities (DBHDD)** – DBHDD's Office of Supportive Housing oversees the Georgia Housing Voucher and Bridge Funding Program, a state-funded program that helps eligible individuals obtain safe and affordable housing and supports their housing stability and integration into the community. The office also oversees the Projects for Assistance in Transition from Homelessness (PATH) program, which connects individuals experiencing homelessness to behavioral health treatment and case management. PATH is funded by the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration.
- **Department of Community Supervision, Department of Corrections, and the Council of Accountability Court Judges** – These entities—along with DCA—jointly administer the Re-Entry Partnership Housing Program (RPH), which provides housing for work-ready convicted felons who have been authorized for release from custody or supervision but remain in prison due to a lack of housing options. RPH is funded through state appropriations and federal grant funds.
- **Criminal Justice Coordinating Council (CJCC)** – CJCC administers the Family Violence Prevention and Services program, which supports the efforts of organizations that provide emergency shelter and supportive services for victims of domestic violence. The program is funded by the U.S. Department of Health and Human Services' Administration for Children and Families.
- **Georgia Department of Education (GaDOE)** – GaDOE's Federal Programs Division administers the Education for Homeless Children and Youth program, which provides federal funding to local education

agencies to address the problems children experiencing homelessness face in succeeding in school. Federal funding is provided through the U.S. Department of Education.

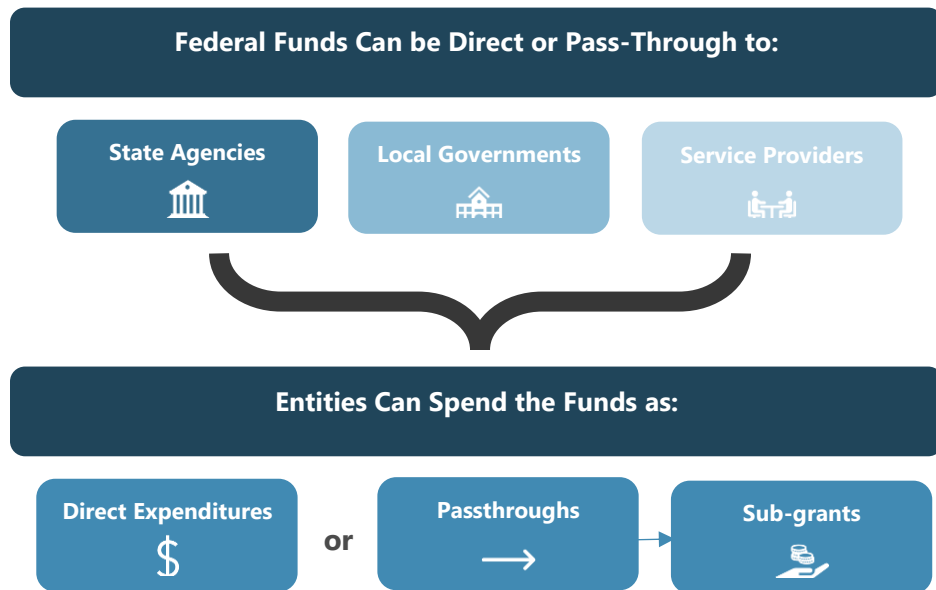
- **Department of Human Services (DHS)** – The Georgia Resilient, Youth-Centered, Stable, and Empowered Program within DHS administers the John H. Chafee Foster Care Program for Successful Transition to Adulthood. This program supports youth currently or formerly in foster care in their transition into adulthood. It is funded through an annual federal formula grant from the U.S. Department of Health and Human Services’ Administration for Children and Families.

Funding

Funding for homeless programs can originate from federal, state, local, or private sources. Federal agencies provide the bulk of governmental funds, used in the form of federal grant awards. As shown in **Exhibit 6**, federal agencies may award funds directly or as pass-through funds to state and local governments and service provider organizations. Direct funds are federal funds made available through an award received directly from a federal agency, such as when HUD awards funding to DCA. Pass-through funds refer to federal funds made available through a sub-grant from a non-federal entity, such as when DCA passes HUD funding through to a service provider.

Exhibit 6

Entities May Spend Federal Grant Funds in One of Three Ways



Source: Interviews and agency documents

For purposes of our review, we categorized the expenditure of federal funds as direct expenditures or pass-throughs and sub-grants. These forms of expenditure are described below.

- **Direct expenditures** – Direct expenditures are expenditures of federal awards by an entity that receives the award directly from a federal agency. For example, HUD awards certain grants directly to service providers (e.g. CoC program grants) that use the awards to fund operations and client services.
- **Pass-throughs and sub-grants** – Pass-through expenditures are federal awards that are passed from a direct recipient to a sub-recipient in the form of sub-grants. For example, DCA (a direct recipient) receives an Emergency Solutions Grant (ESG) allocation from HUD, which it uses to award sub-grants to organizations that provide emergency shelter, street outreach, and other qualifying services related to homelessness.

Expenditures of federal grant funds may occur at multiple levels until the funds are fully distributed. For expenditures of federal funds awarded to state agencies, for example, the state agency may expend a portion of funds for grant administration (e.g., sub-recipient selection and monitoring) and sub-grant the remaining funds to local governments or service providers. These entities may then further sub-grant the funds until the funding is distributed to the final recipients (that ultimately use the funds to provide services).

Findings and Recommendations

Finding 1: Between federal fiscal years 2018 and 2022, an estimated \$706.3 million in federal funds was available for homeless programs and services.

The reported federal funding represents the amount that has been awarded for the life of the grant and is available to spend.

Federal funding available for homeless programs and services in Georgia totaled \$706.3 million between federal fiscal years 2018 and 2022. Available funds were primarily awarded by the U.S. Department of Housing and Urban Development (HUD). Nearly 40% of funds were available to state agencies, with the largest portion available to the Georgia Department of Community Affairs. Local governments and service providers that were awarded funds primarily serve areas with substantial homeless populations.

Other sources of funding available for homeless programs and services include state funds, local funds, and funds from private sources. State and local funds are discussed in Findings 4 and 5.

The federal government provides a significant amount of funding to states, local governments, and service providers for homeless programs and services. Funds are awarded in conjunction with programmatic requirements primarily using two methods. Formula-based funds are awarded based on set formulas that incorporate specific factors such as population, geographic size, and fair market rent (some programs' funding is awarded to areas entitled to receive a set amount of funding from the program each year). Other programs are funded based on a competitive application process in which recipients receive awards based on quality of application, performance, and demonstrated need.

We were not able to capture information on private funding.

To estimate the federal funds available in Georgia, we identified all federal programs that provide funding primarily to address homelessness or the needs of specific homeless populations. We then matched those programs in the federal grants spending database to identify recipients between federal fiscal years (FFY) 2018 and 2022.⁷ The estimated total in this discussion represents all federal funds available to spend in Georgia for the 20 award programs included in this review (see [Appendix D](#) for a list of programs). While other federal funds may be used to address homelessness,⁸ we were not able to isolate those funds in the data available because it was not described as part of their primary mission.

Limitations Exist in Calculating Funding Per Individual Experiencing Homelessness

We acknowledge that Point-in-Time (PIT) Count data indicates that the number of individuals experiencing homelessness decreased from 2018 to 2022 (see Exhibit 1 on page 2) and that the amount of funding available to spend for homeless programs increased during the same period. However, *we cannot correlate these two concepts in this review*. This is because the PIT Count only reports individuals experiencing homelessness who are unsheltered or residing in emergency shelters. As discussed on page 3, other individuals experiencing homelessness are not included, such as those staying with family or friends.

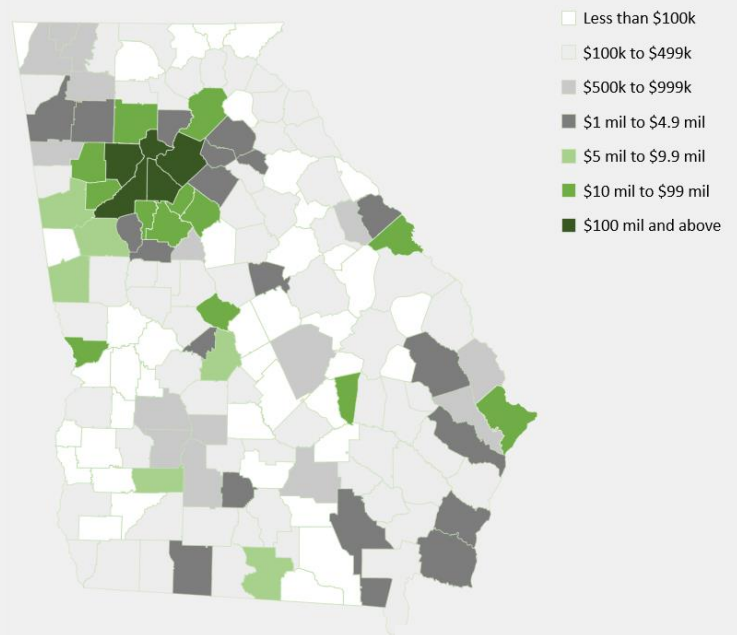
⁷ At the time of our analysis, complete data for federal fiscal year 2023 was not available.

⁸ Examples of federal programs that may address homelessness include the Community Development Block Grant, Home Investment Partnerships, HUD Section 811 Project Rental Assistance (Section 811 PRA), and housing voucher programs, among others.

During FFY 2018-2022, funds were most commonly provided by HUD. Federal funding increased in 2020 due to additional funding for COVID-19 relief through the Coronavirus Aid, Relief, and Economic Security (CARES) Act and American Rescue Plan Act (ARPA). Ongoing programs that received additional funds included Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), and others.⁹ In addition to funding for ongoing programs, COVID relief funds were provided for temporary programs such as the Emergency Rental Assistance (ERA) program funded by the U.S. Treasury. Available ERA funding in Georgia—which totaled over \$1.3 billion in FFY 2020-2022—is not included in this review but is discussed in the text box below.

Federal Emergency Rental Assistance (ERA) Funding

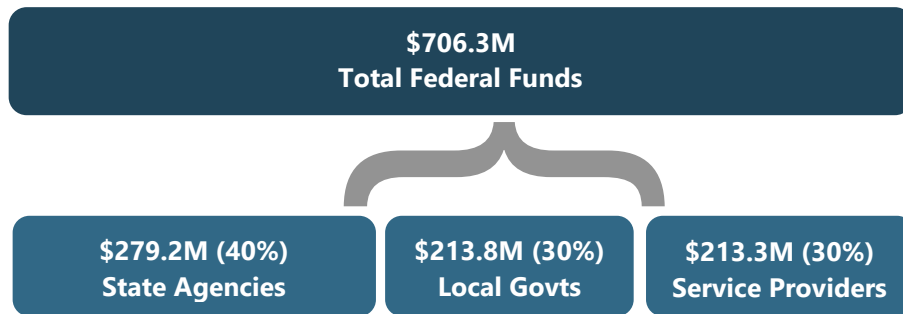
The Emergency Rental Assistance (ERA) program is a temporary financial assistance program established to help those at risk of homelessness or housing instability due to the COVID-19 pandemic. The program consists of two sub-programs: ERA1, which was funded by the Consolidated Appropriations Act of 2021, and ERA2, which was funded by the American Rescue Plan Act (ARPA). Funds were initially provided by the U.S. Treasury to the Governor’s Office of Planning and Budget (OPB); OPB then provided the funds to DCA to distribute to local entities across the state. ERA1 and ERA2 funds totaled \$1.3 billion. Twelve counties received ERA1 or ERA2 funds directly, while each county received funds from DCA. ERA funds were distributed through payments made directly to landlords on behalf of participants, as well as payments made to tenants and utility providers. As shown in the map, ERA funds were concentrated in Georgia’s areas with substantial homeless populations.



⁹ Additional COVID relief funds provided by the CARES Act for ESG and HOPWA are referred to as “ESG-CV” and “HOPWA-CV.” Other programs discussed in this report that received additional funding were the Family Violence Prevention Services (FVPS) program, the John H. Chafee Program for Successful Transition to Adulthood (Chafee Program), and the Supportive Services for Veteran Families (SSVF) program.

As shown in **Exhibit 7**, state agencies had the largest share of federal award funds to spend (40%) during the period. Service providers and local governments each had approximately one-third of federal funding. Funding to each recipient type is discussed below.

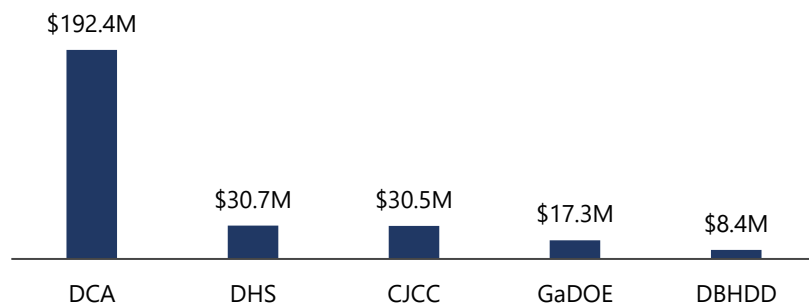
Exhibit 7
State Agencies Had the Largest Share of Federal Grant Funds (FFY 2018-2022)



Source: DOAA analysis of federal spending database (USAspending)

- State agencies** – DCA had \$192.4 million in federal awards to spend between FFY 2018 and 2022, which represents approximately 70% of the \$279.2 million available to state agencies (see **Exhibit 8**). DCA administers the federal government’s largest homeless programs, including the CoC program for the Balance of State, as well as the ESG and HOPWA programs.

Exhibit 8
DCA Had the Vast Majority of Federal Grant Funds (FFY 2018-2022)



Source: DOAA Analysis of federal spending database (USAspending)

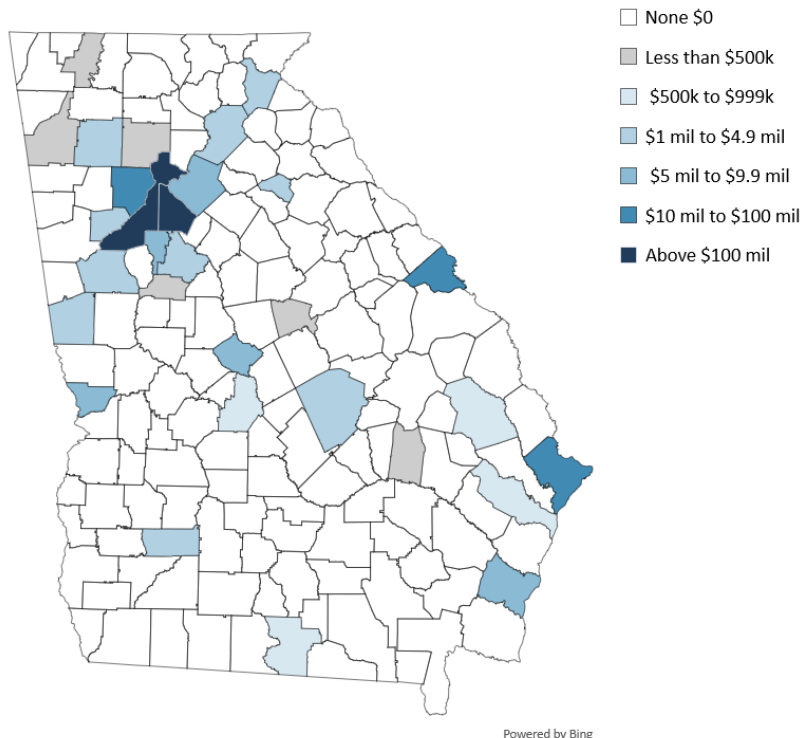
Other state agencies had between \$8.4 million and \$30.7 million during the period, totaling \$86.9 million. DBHDD, DHS, CJCC, and GaDOE receive funding for homeless programs that target specific populations, including children experiencing homelessness, youth exiting foster care, victims of domestic violence, and individuals

experiencing homelessness who have mental health or substance abuse disorders.

- Local governments** – During the period reviewed, local governments had \$213.8 million in federal funding. The City of Atlanta had the largest amount (\$154.1 million, or 72%). Other local governments with a significant amount of federal funds included Augusta-Richmond County (\$11.0 million), the City of Savannah (\$10.1 million), and DeKalb County (\$9.2 million).
- Service providers** – Nonprofit and for-profit service providers had \$213.3 million during FFY 2018-2022. The funding largely went to the areas listed above (Metro Atlanta, Augusta, and Savannah).

As shown in **Exhibit 9**, funding awarded to local governments and service providers primarily went to Georgia’s metro areas. The areas that received the most funding generally represent those with the most substantial homeless populations. As noted above, the City of Atlanta, Augusta-Richmond County, the City of Savannah, and DeKalb County received the largest amount of funds; other areas receiving significant amounts included Glynn County, Dougherty County, Athens-Clarke County, and Bartow County.

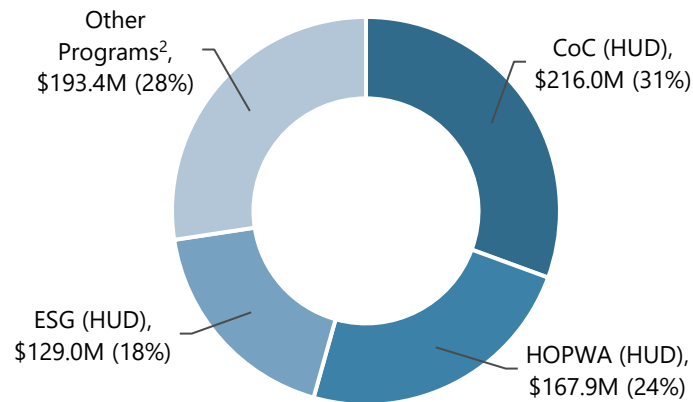
Exhibit 9
Federal Funding for Local Governments and Service Providers is Concentrated in Areas with Substantial Homeless Populations (FFY 2018-2022)



Source: DOAA analysis of federal spending database (USAspending)

Federal funds were distributed for a variety of programs that provide both housing and non-housing services. Non-housing services may include street outreach, emergency shelters, assistance for veterans experiencing homelessness, assistance for victims of domestic violence, educational support for children experiencing homelessness, or other supports. Funding for specific programs (and their respective federal agencies) are shown in **Exhibit 10**. See Finding 7 for more information about the major programs shown below, including how they are administered and how funds are awarded.

Exhibit 10
CoC, ESG, and HOPWA Represent 73% of Federal Funds
(FFY 2018-2022)¹



¹ These amounts include COVID relief funds.

² Other programs for which awards totaled less than \$100 million (and less than 10% of total awards) include: SSVF (VA) \$30.5 million or 4%, FVPS (HHS) \$30.8 million or 4%, Chafee Program (HHS) \$29.7 million or 4%. This also includes several programs with awards totaling less than \$20 million.

Source: DOAA analysis of federal spending database (USAspending)

DCA's Response: *DCA partially agreed with the finding, noting that it did not replicate the estimated funding to state and local governments. It agreed that federal funds are the primary resource for homeless programs and services. DCA also noted that additional COVID-19 funding will not continue in future annual grant cycles for these programs.*

Finding 2: Approximately 78% of federal funds available has been spent on homelessness programs and services.

Of the \$706.3 million in federal funds available for homelessness services in Georgia, approximately \$549.2 million (78%) has been spent. Remaining funds are available to spend in future years.

This finding reports the expenditure of direct funds received by state and local governments and service provider organizations from federal agencies.

When entities receive federal funds, they generally have one or more years to spend what they receive. For example, ESG recipients have two years from the date HUD signs the grant agreement to incur expenses, but they may continue to draw down funds for expense reimbursement for an additional 90 to 120 days after the period ends.¹⁰ When recipients fail to spend all funds before the end of the grant period—which is the length of time between when the grantee can begin to spend funds and when all funds must be spent—the remaining amount is returned to the funding agency. Programs can be funded through multiple grants, and each may have a different grant period.

Availability vs. Expenditure of Direct and Pass-Through Funds

Federal fund recipients (e.g., DCA, City of Atlanta, Salvation Army) can spend their awards directly or serve as pass-through entities and provide the funds to other recipients. This can impact when federal funds are considered spent and when they are still considered available. Generally, federal funds are considered spent when a recipient incurs costs (i.e., obligates funding for a good or service). After the recipient draws down funding to pay for that cost, the funds are considered to be liquidated and are no longer available for federal recapture (the process by which the federal government can pull funds from agencies that have not drawn down their grant award in a timely manner).

When the federal recipient passes funds to another recipient, they are not considered fully spent until the final recipient of the funds incurs cost. For example, DCA may be designated as the recipient, but when it allocates funds to a nonprofit entity the funds are still considered available to spend until the nonprofit actually obligates those funds to pay for a good or service. Any pass-through funds that have been obligated but not drawn down are also at risk for reallocation if not spent in the required time frame. According to DCA, staff monitor the spending of pass-through funds and will reallocate to other sub-recipients when needed (e.g., a service provider closes and can no longer spend funds).

The amounts shown as “spent” in Exhibits 11-14 represent the total costs entities have incurred toward the balance of awards from fiscal year 2018 to fiscal year 2022. The amounts shown as available represent funds allocated but not spent. As previously discussed, entities may have several years to spend available funds.

To identify the federal funds spent, we reviewed expenditures relative to those available (discussed in the previous finding). For fiscal years 2018 through 2022, expenditure information was available from the Federal Audit Clearinghouse.

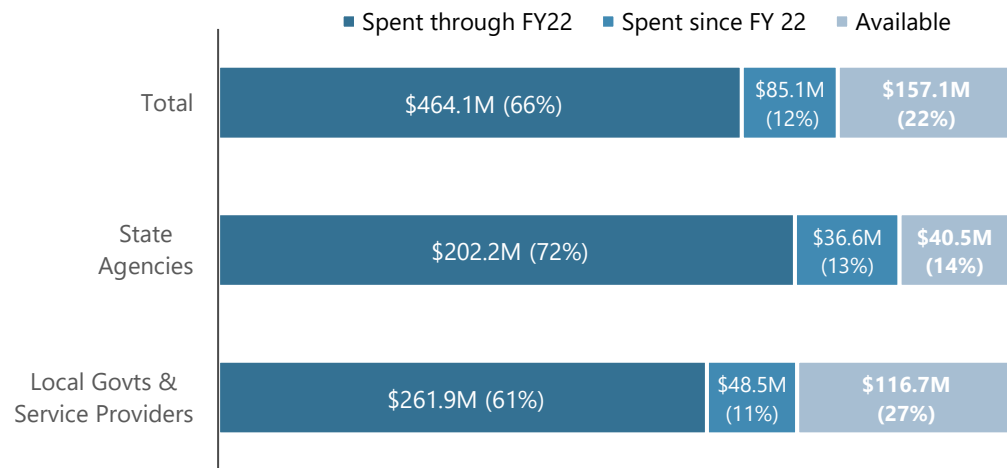
¹⁰ An entity incurs a cost when it becomes liable for an expense. Incurred costs are based on the accrual basis of accounting, which dictates that costs be recorded when they are incurred, even if cash payment has not occurred. For example, an entity incurs a cost for its electric bill in the month the electricity was used—even if the bill will not be paid until the following month. A draw down of funds represents a transfer of grant funds from the grantor to the grantee to pay grant-related expenses. Because entities draw down funds to provide cash payment, drawdowns may occur after costs have been incurred.

While Clearinghouse data is not comprehensive, we were able to use additional data to identify spending for most entities during this period. To obtain expenditure information after fiscal year 2022—the most recent year for which audited data was available—we requested information from state agencies and local governments with the largest amount of spending (which represented 90% of total local spending). Because entities have different fiscal years and reported additional spending as of different dates, the amounts reported in this analysis represent estimates of federal spending (see [Appendix B](#)).

Of the \$706.3 million available in federal funds, approximately 78% (\$549.2 million) has been spent, as shown in **Exhibit 11**. Approximately 85% (\$238.8 million) of funds available to the state has been spent, compared to 73% (\$310.4 million) of funds available to local governments and service providers. In total, approximately \$157.1 million is available for future spending.

Exhibit 11

Approximately 78% of Total Federal Funds Available Has Been Spent^{1,2}



¹ Figures reported as spent since fiscal year 2022 are based on information provided by state and local entities.

² Percentages may not total to 100% due to rounding.

Source: DOAA analysis of federal spending databases (USA Spending and Federal Audit Clearinghouse) and information reported by state agencies and local governments

State Agencies

State agencies have spent an estimated \$238.8 million (85%) of total federal funding available. State agencies generally distributed the funds to other entities, either as a pass-through entity or through a competitive grant process; however, the state also directly spent funds for eligible administrative purposes. Spending by DCA and other state entities is described below.

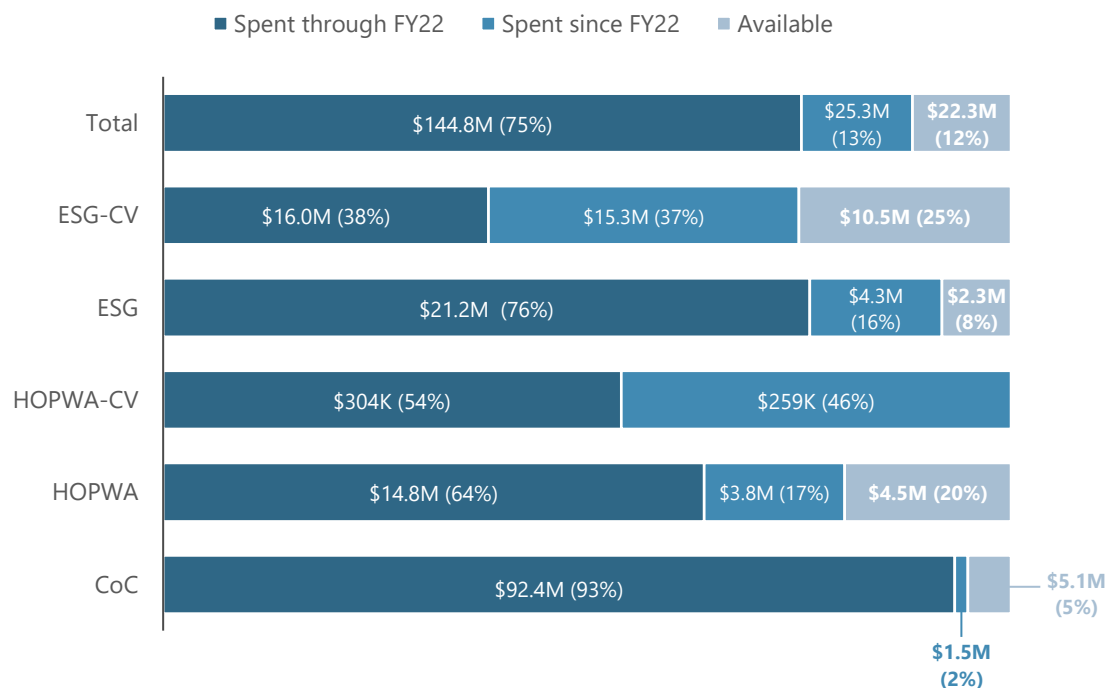
Department of Community Affairs

As discussed in Finding 1, DCA had the majority of federal funds available to spend during the period reviewed (\$192.4 million) for multiple programs. DCA has spent an estimated \$170 million of these funds (88%), leaving \$22.3 million for future spending. As shown in **Exhibit 12**, the percentage of funds spent by program ranged from 75% to 100%.

Most of DCA’s spending (55% or \$93.9 million) was related to CoC funds awarded to other entities through a competitive sub-grant process. These processes were also used to distribute the majority of other program funds. Between state fiscal year 2018 and 2022, DCA spent approximately \$15.0 million for administrative expenses.

DCA staff indicated that funding is spent in accordance with the grant period. Staff also stated that they expect to fully spend all funding connected to a grant cycle that is still in process.

Exhibit 12
DCA Has Spent 88% of Federal Funds Available^{1,2}



¹ Figures reported as spent since fiscal year 2022 are based on information provided by state and local entities.

² Percentages may not total to 100% due to rounding.

Source: DOAA analysis of federal spending databases (USAspending and Federal Audit Clearinghouse) and information reported by state agencies and local governments

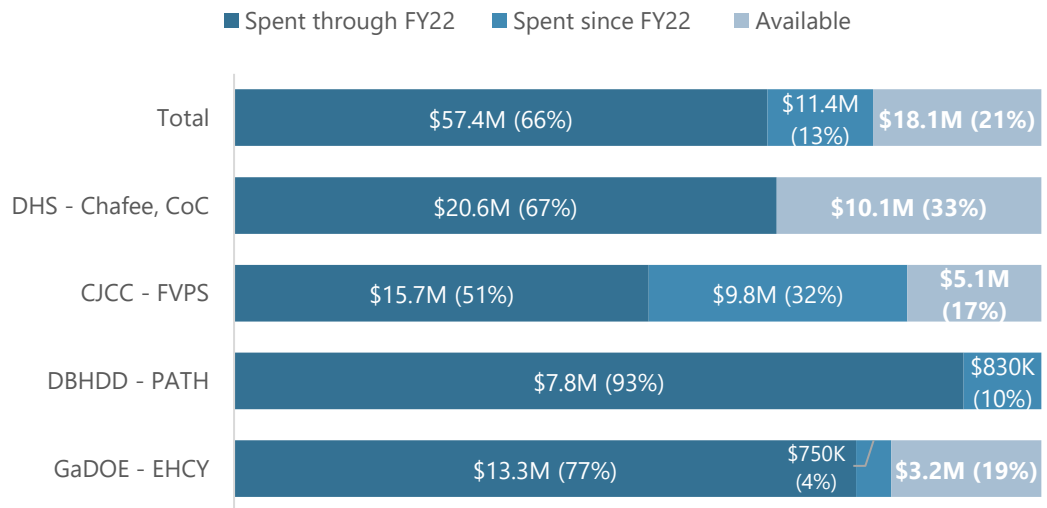
Other State Entities

As discussed in Finding 1, approximately \$86.9 million in federal funds went to other state entities for several programs. These entities have spent an estimated \$68.8 million (80%), leaving \$18.1 million available for future years.

As shown in **Exhibit 13**, spending by program has varied. In particular, DBHDD has spent all of its \$8.4 million in PATH funds to deliver outreach services to individuals with serious mental health and/or substance abuse disorders experiencing or at risk of homelessness. Other agencies have spent the majority of their funds but have funds available for use in future years. The difference in percentages is often related to the particular grant program’s timing and requirements.

Like DCA, federal funding for other state agencies is generally sub-granted or sub-awarded to provider organizations. For example, GaDOE allocated Education for Homeless Children and Youth (EHCY) program funding to local education agencies throughout the state. CJCC and GaDOE, the two agencies for which administrative expenditure information was available, also spent \$1.1 million (4%) and \$2.1 million (13%) respectively on administrative costs between state fiscal years 2018 and 2023.

Exhibit 13
Other State Agencies Have Spent Approximately 80% of Federal Funds Available^{1,2}



¹ Figures reported as spent since fiscal year 2022 are based on information provided by state and local entities. DHS did not respond to our request for additional expenditure information. While we could determine DHS spending of Chafee funds using TeamWorks financials, we could not tie these expenditures to the awards included in our analysis.

² Spending shown for DBHDD – PATH exceeds awards because federal spending data was more complete, while award data may not have reflected the most recent changes to award amounts.

Source: DOAA analysis of federal spending databases (USAspending and Federal Audit Clearinghouse) and information reported by state agencies and local governments

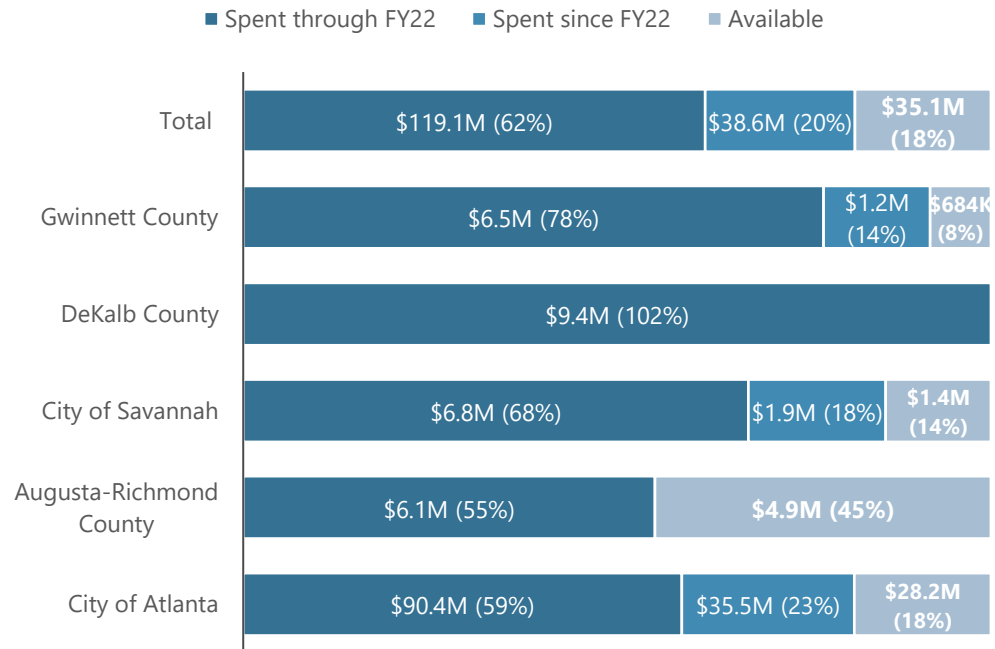
Local Governments

Local governments spent an estimated \$175.8 million, or 82% of the \$213.8 million in available federal funds. These funds were primarily from three major programs—HOPWA, CoC, and ESG. Total spending in these programs ranged from 76% to 96% of funds available.

As shown in **Exhibit 14**, local governments that received the largest amount of federal funds have spent them at varying rates. The City of Atlanta—which had the most federal funds available by far—has spent an estimated \$125.9 million (82% of its \$154.1 million). The next largest local recipient—Augusta-Richmond County—has spent 55% of the \$11.0 million available. The City of Savannah has spent approximately 86% of the \$10.1 million available, while DeKalb County has

spent all of its \$9.2 million in awards. Finally, Gwinnett County has spent 92% of its \$8.4 million.

Exhibit 14
Local Governments Receiving Majority of Federal Funds Have Spent At Least Half of Funds Available^{1,2}



¹ Figures reported as spent since fiscal year 2022 are based on information provided by local entities. While Augusta-Richmond County reported no additional spending since FY2022, it is likely that additional spending has occurred based on discussions with Augusta CoC staff.

² Spending shown for DeKalb County exceeds awards because federal spending data was more complete, while award data may not have reflected the most recent changes to award amounts.

Source: DOAA analysis of federal spending databases (USAspending and Federal Audit Clearinghouse) and information reported by state agencies and local governments

Most of the federal funding available to City of Atlanta and Gwinnett County was passed through to service providers. By contrast, Augusta-Richmond County, City of Savannah, and DeKalb County spent a large portion of the funds on their own programs. For example, the majority of Augusta-Richmond County’s expenditures was spent on HOPWA and ESG services it provides directly. Similarly, DeKalb County directly spent two-thirds of its funds on CoC- and ESG-related services.

Service Providers

Service providers include a variety of entities that administer programs or provide direct services to individuals experiencing homelessness (e.g., nonprofit organizations, community service boards, healthcare providers, faith-based organizations). As such, they receive federal funds from several programs. Of the \$213.3 million in federal funds made available directly to service providers between 2018 and 2022, an estimated 63% (\$134.6 million) has been spent. Service

providers have likely spent more funds since 2022; however, this information was not readily available to include in our analysis.

It should be noted the paragraph above focuses only on service provider spending for funds received directly from the federal government. Total federal expenditures for service providers (which include federal funds received as subawards from state and local governments) are discussed in Finding 3.

DCA's Response: *DCA partially agreed with the finding, which covered more than DCA's spending of federal funds. It noted that all DCA-administered grant awards have been expended as required by the awarding agency. DCA indicated that homeless awards are obligated over multiple years and will be available over the life of the grant, as stated in the report. According to DCA, grants expire on a rolling cycle and a grant's lifespan varies from two to five years depending on the program and the awarding federal agency.*

Finding 3: As the final recipients of federal funding, service providers spent approximately \$352.4 million to directly serve homeless populations between fiscal years 2018 and 2022.

This finding reports service providers' expenditure of direct funds they received from federal agencies and pass-through funds received from other direct recipients of federal funds (e.g., state and local governments).

Service providers are the most common recipients of federal funding, whether it is through direct federal grants or from state and local governments who first received the funding. Service providers spent approximately \$352.4 million, which accounts for 50% of the \$706.3 million in federal funds available. Four organizations spent at least \$10 million individually.

As discussed in the previous finding, approximately \$549.2 million of federal funds available has been spent. Expenditures can be related to direct spending by the federal recipient, or a release of funds to other entities, in which case the original federal recipient is known as a pass-through entity. For example, while the City of Atlanta has spent an estimated \$125.9 million of funds available, a portion was sent to other organizations. Similarly, state agencies receiving federal funding generally serve as grantors to local governments or service providers.

When direct and pass-through funds are considered, service providers are usually the spender of federal funds.

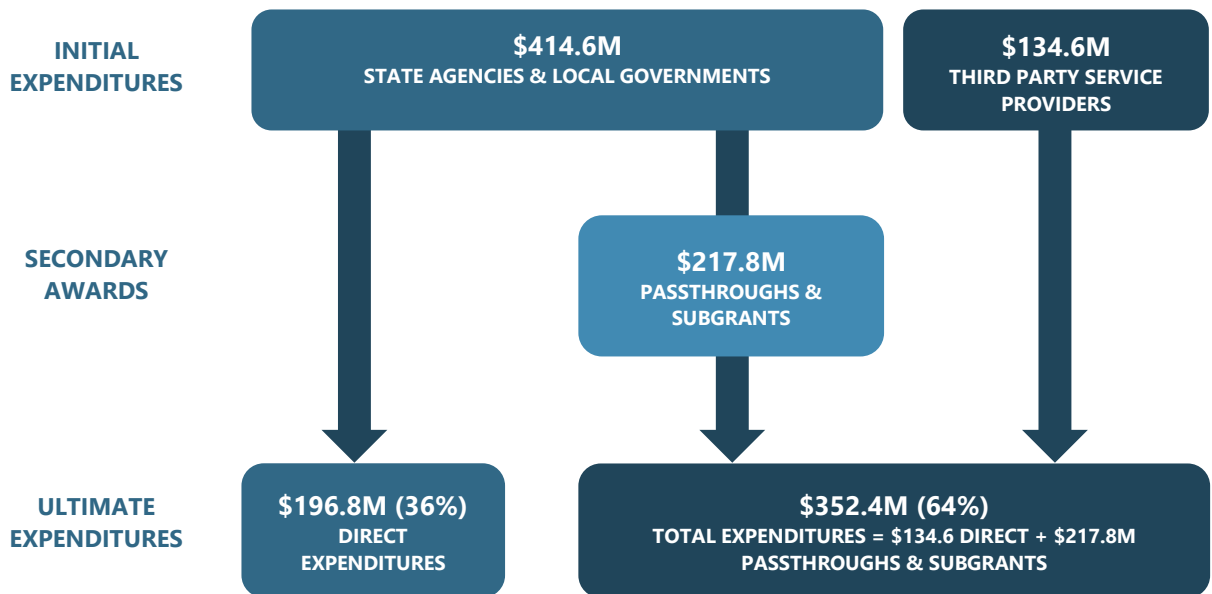
When direct and pass-through funds are taken into account, the ultimate recipients—and spenders—of federal funds are most commonly service providers. While state agencies and local governments received 70% of federal awards, the initial expenditure of those funds was primarily via pass-throughs and sub-awards to other entities. State agencies passed through \$36 million total, and sub-granted much of the remaining funds to other entities, while local governments passed through \$115 million total to service providers during the period reviewed.¹¹ Finally, some large service providers also passed through

¹¹ The pass-through amounts are based on funds available to state agencies and local governments between fiscal years 2018 and 2022. We were not able to determine the extent to which any additional spending after fiscal year 2022 was pass-through funds.

federal funds to other providers (\$6.5 million in fiscal years 2018 to 2022). Depending on the grant, state agencies, local governments, service providers, and pass-through recipients may be allowed to use a percentage of funding for administrative expenditures.

As shown in **Exhibit 15**, service providers were responsible for approximately 64% of total spending of funds available for homeless services (\$352.4 million¹²). Nearly 45% of the spending (approximately \$152.8 million) was from funds related to the CoC program (the largest federal program dedicated to homelessness—see **Exhibit 10** in Finding 1). The second largest portion (20% or \$71 million) of service provider spending was from funds related to HOPWA. ESG funds represented 12% (\$42 million) of spending and Supportive Services for Veteran Families (SSVF) 5% (\$18.8 million).

Exhibit 15
Approximately Two-Thirds of the \$549.2M in Federal Award Expenditures Was Spent by Service Providers

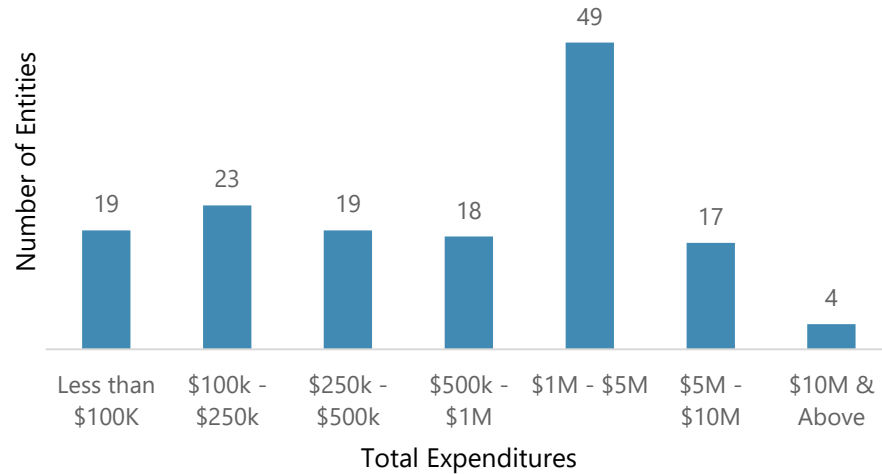


Source: DOAA analysis of USAspending and Federal Audit Clearinghouse data

Overall, 149 service provider organizations reported spending federal funds during the period reviewed. As shown in **Exhibit 16**, 49 organizations have spent between \$1 million and \$5 million of funds available. Twenty-one organizations spent more than \$5 million, while 42 spent less than \$250,000.

¹² As described in the previous finding, service provider organizations were direct recipients of some federal funds and have spent \$134.6 million of those funds.

Exhibit 16
Most Service Providers Have Spent Less than \$5 Million of Funds Available to Provide Homelessness Services



Source: DOAA analysis of Federal Audit Clearinghouse data

Of the \$352.4 million in total expenditures by service providers, approximately \$105.2 million (or 30%) was concentrated at four entities. Each spent more than \$10 million and primarily works in Metro Atlanta.

- HOPE Atlanta (Travelers Aid of Metropolitan Atlanta)** – Headquartered in the City of Atlanta, this entity serves homeless populations through street outreach, permanent supportive housing programs, special needs housing programs (e.g., HOPWA), rapid re-housing programs, and prevention services across 28 Georgia counties.

HOPE Atlanta (Travelers Aid) has spent approximately \$36.2 million of funds available. Most of the funds were available through the HOPWA, SSVF, and CoC programs.
- Status: Home (formerly Jerusalem House)** – Located in the City of Atlanta, this entity serves individuals experiencing or at risk of homelessness who have been affected by HIV/AIDS. Status: Home provides clients with facilities-based housing, independent living housing, and tenant-based rental assistance. Additionally, staff provide case management, linkage to HIV care, employment services, mental health services, and legal services to all clients.

Status: Home has spent approximately \$30.3 million of funds available. Most of the funds (\$28.1 million) were HOPWA, and the remaining \$2.2 million were CoC funds.

- **Project Community Connections** – This organization aims to serve homeless populations in seven Metro Atlanta counties by moving individuals or families into appropriate housing as efficiently as possible. Case managers provide clients with housing counseling, advocacy, and locator services, as well as landlord liaison services and financial assistance when needed.

Project Community Connections has spent approximately \$20.7 million of funds available. The expenditures were from ESG funds (\$8.8 million), CoC funds (\$6.15 million), and SSVF funds (\$5.75 million).

- **Caring Works** – Caring Works serves homeless populations in Metro Atlanta counties through permanent supportive housing programs, behavioral health programs, and support services. Caring Works focuses on individuals and families facing specific challenges that have resulted in chronic homelessness, such as disabilities, criminal records, HIV/AIDS, domestic violence, and post-traumatic stress disorder.

Caring Works has spent approximately \$18.3 million of funds available. Nearly all expenditures (\$16.6 million) were from CoC funds. The remaining expenditures were from SSVF, HOPWA, and GPD funds.

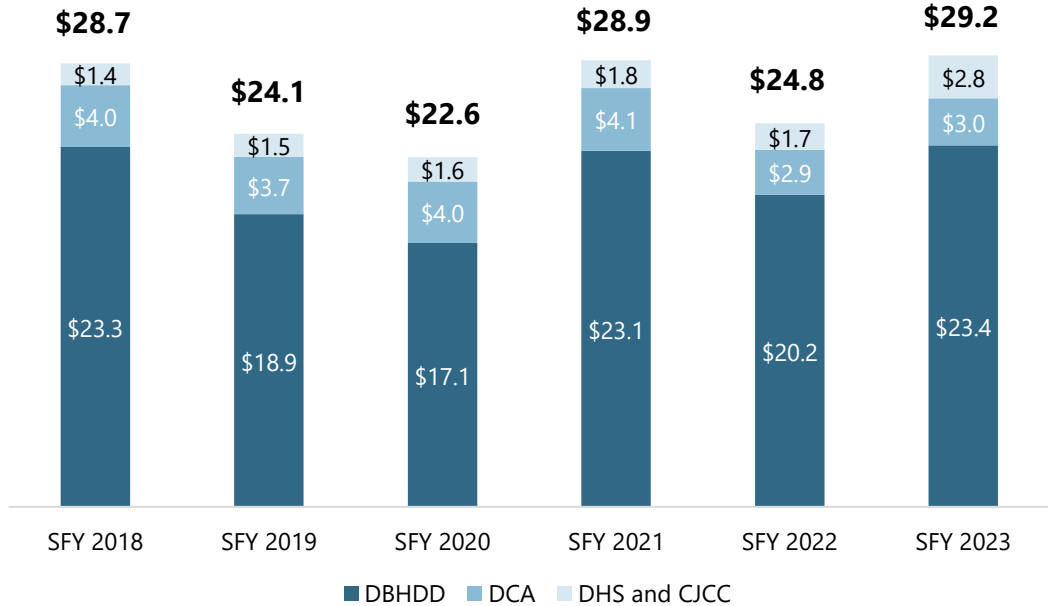
DCA’s Response: *DCA indicated its partial agreement with the finding, noting that it could not “comment on the full number represented,” which covers more than DCA’s pass through spending. However, DCA noted that these funds are audited regularly by the awarding federal agency.*

Finding 4: Expenditures of state funds for homeless programs fluctuated between fiscal years 2018 and 2023.

Between state fiscal years 2018 and 2023, the state spent \$158.4 million on homeless programs and services. Annual amounts fluctuated but did not vary significantly. Expenditures were primarily incurred by the Department of Community Affairs and the Department of Behavioral Health and Developmental Disabilities for programs that are fully or primarily funded by the state.

As shown in **Exhibit 17**, state spending ranged from \$22.6 million to \$29.2 million between state fiscal years 2018 and 2023, averaging \$26.4 million each year for homeless programs and services. Expenditures were incurred primarily by two state agencies—the Department of Behavioral Health and Developmental Disabilities (DBHDD) and the Department of Community Affairs (DCA). The Department of Human Services (DHS) and the Criminal Justice Coordinating Council (CJCC) also spent a small amount of state funding to meet matching requirements for federal grant programs.

Exhibit 17
State Expenditures for Homeless Programs and Services Have Fluctuated
(State Fiscal Years 2018-2023)

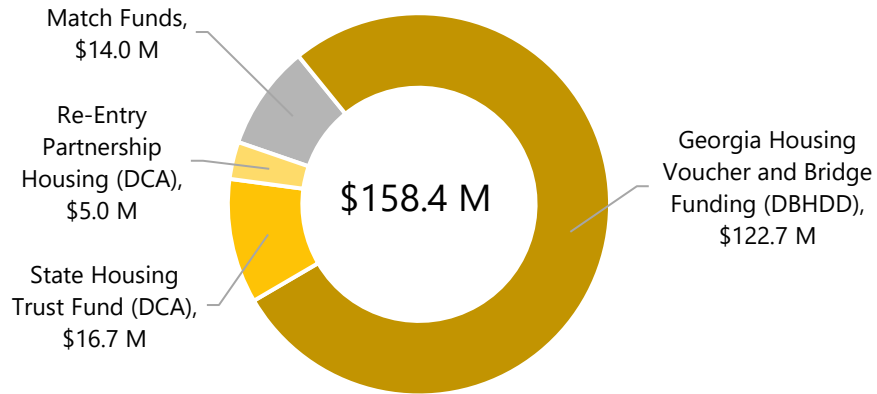


¹ Amount in millions.
 Source: Agency expenditure data

Funding for DBHDD and DCA fluctuated during the period reviewed. In particular, DBHDD’s funding decreased by 27% between fiscal years 2018 and 2020 before increasing to 2018 levels in fiscal year 2021. DBHDD staff reported that state expenditures were lower in 2019 and 2020 due to reduced program utilization. Funding for DCA generally remained stable between fiscal years 2018 and 2021 before decreasing by 28% in fiscal year 2022. DCA staff reported that 2022 and 2023 state expenditures were lower because the agency needed to prioritize spending a large amount of federal COVID relief funding before expenditure deadlines.

As shown in **Exhibit 18**, the majority of state expenditures over the period reviewed were for fully or primarily state-funded programs that address homelessness. A smaller portion was provided to agencies to meet the match requirements for federal grants. These programs are discussed below the exhibit.

Exhibit 18
Most State Funds Provided Were for DBHDD’s Assistance Program
(State Fiscal Years 2018-2023)



Source: Agency expenditure data

- Georgia Housing Voucher (GHVP) and Bridge Funding Program** – The GHVP and Bridge Funding Program provides housing vouchers and start-up rental assistance for individuals experiencing homelessness who have been diagnosed with severe and persistent mental illness. The program began in 2010 in response to the state’s 2010 Settlement Agreement with the U.S. Department of Justice, which pertained to violations of the Americans With Disabilities Act. DBHDD’s Office of Supportive Housing administers the program.

Approximately \$122.7 million in state funds was spent on the GHVP and Bridge Funding program between state fiscal years 2018 and 2023, representing 77% of total funds. Annual spending was approximately \$20.4 million per year. As of June 2023, the program had almost 2,100 participants.

- State Housing Trust Fund for the Homeless (SHTF)** – The SHTF, which is administered by DCA, supports organizations that provide housing and other services to individuals experiencing homelessness. These organizations include nonprofits, provider networks, local governments, and other entities. SHTF funds are granted to organizations primarily to help them meet the match requirements of federal grants. For example, SHTF is used to meet ESG’s 100% match requirement. In addition, federal grants can be more restrictive and state funds provide more flexibility. For example, DCA staff indicated that organizations often use SHTF funds to perform duties (e.g., case management) not allowable under their federal grants.

Approximately \$16.7 million was spent on SHTF between state fiscal years 2018 and 2023, representing 11% of total funds. Annual

spending was approximately \$2.8 million per year. Approximately 76% of SHTF funds (\$12.6 million) was disbursed to 122 entities during the period, including the cities of Albany, Hinesville, and Valdosta; Salvation Army locations across the state; community service boards; and other organizations. DCA retained the remaining funds (approximately \$4.1 million, or 24%) for administrative activities (DCA staff indicated that these costs are relatively high because SHTF funds support the administration of various federal grant programs).

- **Re-Entry Partnership Housing Program (RPH)** – This program provides housing for work-ready convicted felons who have been authorized for release from custody but remain in prison due to a lack of housing. Providers are paid \$750 to \$850 per month per housed participant for room and board for up to six months. RPH is jointly administered by DCA, DCS, GDC, and CACJ.

More than \$9.1 million was spent on RPH between state fiscal years 2018 and 2023; \$5.0 million came from state appropriations (representing approximately 3% of total state funds). The remainder of funding for RPH came from federal State Criminal Alien Assistance Program (SCAAP) funding.¹³ Total annual spending for RPH was approximately \$1.5 million per year (\$830,815 in state appropriations). In fiscal year 2023, the program placed 433 individuals into housing based on referrals from DCS, GDC, and CACJ. Approximately \$996,000—or approximately \$166,000 per year—was spent on DCA administrative activities (11% of total).

In addition to the programs described above, approximately 9% of state funds (\$14.0 million, or \$2.3 million per year) was used to meet federal matching requirements during the period reviewed. These federal programs included the John H. Chafee Foster Care Program for Successful Transition to Adulthood (DHS), the Family Violence Prevention and Services program (CJCC), and the Projects for Assistance in Transition from Homelessness program (DBHDD).

DCA's Response: *DCA partially agreed with the finding, which covers more than DCA's spending of state funds. DCA stated that while state funding may fluctuate, it is a relatively insignificant fund source for service providers compared to federal and philanthropic funds, which have a higher degree of predictability. It noted that "with predictable, added capacity, DCA would be able to seek out new funding opportunities through the State Housing Trust Fund."*

¹³ Georgia Department of Corrections (GDC) is the recipient of SCAAP funding. In 2016, the state made a one-time re-allocation of \$5.2 million in SCAAP funds for RPH. DCS staff reported that approximately \$800,000 of these funds remain, which they estimate will be spent by the end of fiscal year 2025. After this, RPH will be funded solely through the \$830,815 it receives in annual state appropriations.

Finding 5: Most local government survey respondents reported they did not spend their own funds on homelessness programs in 2022.

Most local governments that responded to our survey did not spend their own funds on homeless programs or services in 2022. Of those that did spend local funds, almost half were in areas with substantial homeless populations. Local funds commonly supported emergency service programs.

We surveyed all local governments—including counties, municipalities, and consolidated governments—in the state to obtain information about local funding for homeless programs and services in fiscal year 2022.¹⁴ Of the 690 local governments in the state, 204 (30%) responded to our survey.¹⁵ The survey focused on local government funds only; local spending of federal dollars received is discussed in Finding 2.¹⁶ Questions were intended to isolate homeless-specific programs, though it should be noted a variety of local programs may assist individuals experiencing homelessness in addition to other populations (e.g., food banks, mental health treatment centers).

Most local governments that responded to our survey reported that they did not directly operate homeless programs or services or provide funding to service provider organizations' homeless programs. Of the 204 survey respondents, 35 (17%) reported using funds to operate their own programs or support homeless programs operated by service provider organizations; of those, 22 (11% of total respondents) reported using local funds for these programs. These local governments included those in areas with substantial homeless populations, as well as other areas of the state.¹⁷

Spending in Areas with Substantial Homeless Populations

Of the 23 counties and metropolitan cities with substantial populations that provided information, 12 reported spending their own funds on homeless programs (see **Exhibit 19**).¹⁸ Five counties and two cities with substantial homeless populations reported no local spending. The remaining four counties reported they did not provide services.

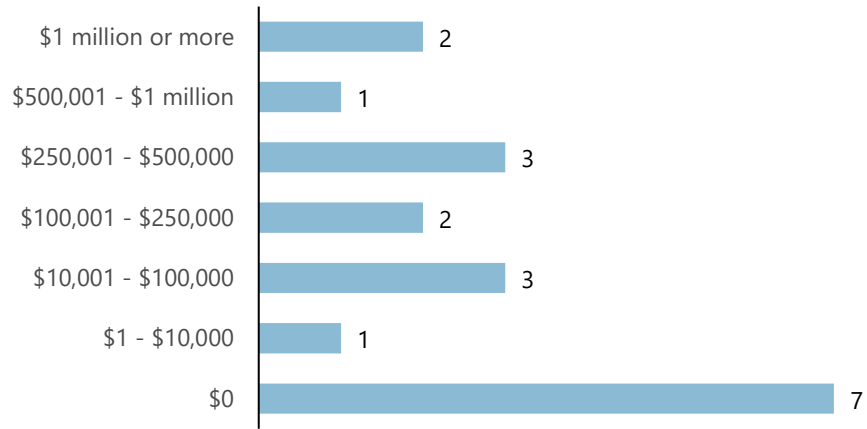
¹⁴ Because local governments' fiscal years can vary (e.g., July-June, January-December), our survey asked respondents to report on expenditures for their fiscal year 2022 (the most recent fiscal year completed).

¹⁵ We contacted counties with substantial homeless populations (See Appendix C) directly when they did not respond to the survey.

¹⁶ Information regarding local spending of federal and state dollars was obtained from federal and state sources.

¹⁷ In our analysis of spending in areas with substantial homeless populations, we included two additional counties—DeKalb and Fulton—that did not respond to our survey but did provide information to us directly.

¹⁸ Based on 2022 PIT count data, we identified 19 counties with substantial homeless populations (i.e., at least 100 individuals experiencing homelessness). For this analysis, we also included five metropolitan cities from those counties. Of these 24 counties and cities, 21 provided information through our survey and two provided information via email. Representatives from one area—Lowndes County—did not respond to our survey or our attempts to obtain expenditures directly.

Exhibit 19**Over Half of Local Governments with Substantial Homeless Populations Reported Spending Their Own Funds on Homeless Programs (FY 2022)¹**

¹ Not all counties or metropolitan cities with substantial homeless populations are included in this exhibit. Lowndes County did not respond to our survey, nor did they report any expenditures to us directly. Floyd, Stephens, Troup, and Whitfield counties responded to our survey, but stated they did not provide or fund homelessness services.

Source: Local government survey and interviews

Almost all local governments in areas with substantial homeless populations that spent their own funds reported using these funds for emergency service programs, which include emergency shelters, weather shelters, domestic violence shelters, or day centers. Other common programs supported by local funds include homelessness prevention programs and housing programs, as well as outreach and case management, which includes street outreach or other services brought directly to individuals experiencing homelessness. Five reported spending local funds on law enforcement programs dedicated to individuals experiencing homelessness.

Examples of the local funding expenditures in areas with substantial homeless populations are discussed below.

- **Between \$500,001 and \$1 million** – Gwinnett County reported spending its own funds to support emergency services provided by other entities.
- **Between \$250,001 and \$500,000** – Athens-Clarke County (ACC) reported spending local funds to operate a law enforcement program dedicated to homelessness (see description on page 32), support emergency services and street outreach, and employ a homeless specialist who coordinates homeless initiatives throughout ACC’s various divisions. Chatham County and the City of Decatur also reported using local funds for initiatives such as emergency services, street outreach, homelessness prevention, and healthcare.

- **Between \$100,001 and \$250,000** – The City of Marietta reported spending its own funds to support dedicated homeless liaison officers for the Marietta Police Department (See Finding 6). DeKalb County reported spending county funds on homelessness prevention, emergency shelter, housing, and case management programs.
- **Between \$10,001 and \$100,000** – The City of Savannah reported spending funds to operate an emergency warming shelter, employ a Homelessness Policy Director, and support homelessness prevention, street outreach, and housing services. Hall County reported spending its own funds to support emergency services. Cherokee County reported spending its own funds to support several types of services performed by other entities; these include emergency services, healthcare, homelessness prevention, and housing, as well as outreach and case management.
- **Up to \$10,000** – Bartow County reported spending its own funds on emergency services, including support to its local homeless shelter and outreach and case management.
- **No Local Funds Spent** – Augusta-Richmond County, Columbus-Muscogee County, Cobb County, Macon-Bibb County, Glynn County, City of Atlanta, and City of Brunswick reported providing services or funding but did not report spending any local funds.¹⁹
- **No Homelessness Services Reported** – The remaining survey respondents with substantial homeless populations—Floyd County, Stephens County, Troup County, and Whitfield County—reported their local government did not operate or provide funding for homelessness services.

Spending by Other Local Governments

While not in areas with substantial homeless populations, 12 local governments reported spending their own funds for homeless programs. These were the cities of Calhoun, Covington, Kingsland, Offerman, and St. Mary's, as well as Banks, Brantley, Colquitt, Forsyth, Henry, Lee, and Newton counties. All reported spending between \$1 and \$100,000, with most indicating that they used funds primarily to support emergency services. Additionally, one local government—the City of Calhoun—reported one of their locally funded officers spends a portion of his time dedicated to calls related to homelessness.

¹⁹ Macon-Bibb County, Glynn County, and City of Atlanta reported providing services or funding; however, they did not know whether local funds were spent.

Finding 6: Law enforcement agencies do not track expenditures but reported performing certain activities to address homelessness during their normal duties.

Law enforcement agencies reported they regularly encounter people experiencing homelessness during their normal duties but do not typically track the frequency of encounters or associated costs. Some local law enforcement agencies report having more structured programs and initiatives aimed at assisting individuals experiencing homelessness; however, costs associated with these efforts are not consistently tracked.

To determine the extent to which interactions with the homeless population and costs are tracked, we contacted 10 police departments or sheriff's offices in areas with substantial homeless populations,²⁰ as well as representatives of the Georgia Sheriffs' Association and the Georgia Association of Chiefs of Police. We also contacted the Georgia Department of Public Safety (DPS), which includes Georgia State Patrol, Capitol Hill Security, and Capitol Police.

State law enforcement officers do not have direct responsibility for performing activities to address homelessness. However, DPS staff indicated officers may encounter individuals experiencing homelessness while performing their normal duties—particularly in Atlanta. These encounters are not tracked separately.

Local law enforcement deal more directly with homelessness—particularly unsheltered populations. These contacts are typically initiated during patrols or in response to calls about panhandling, encampments, loitering, trespassing, littering, and drunk and disorderly conduct. While not universally tracked,²¹ law enforcement agencies we contacted generally believe homelessness is a significant issue in their jurisdictions and has significantly increased over the last five years.

In addition to the encounters during normal duties, some local law enforcement agencies have taken a more proactive and structured approach to homelessness in the areas they serve. Of the 10 local law enforcement agencies we contacted, several reported at least one initiative dedicated to assisting people experiencing homelessness. Common initiatives (and their costs, when information was available) are described in the next section.

²⁰ Local law enforcement agencies contacted represented Athens-Clarke County, Augusta-Richmond County (two agencies), Chatham County, Clayton County, Gwinnett County, and the cities of Atlanta, Brunswick, Columbus, and Marietta.

²¹ Some law enforcement agencies have attempted to track homelessness encounters in various ways. This includes scraping data from service calls with "homeless" in the narrative and inputting information into a dedicated database based on a particular code.

Law Enforcement Offices Report Increasing Calls Related to Homelessness

Due to the inconsistent tracking of contacts, we were not able to fully assess the magnitude of law enforcement encounters with people experiencing homelessness. However, some law enforcement officers attempted to estimate the number of contacts. For example, Athens-Clarke County Police Department estimated that they received 1,600 calls from May to December 2020 and approximately 1,700 calls from May to September in 2023. In addition, Brunswick Police Department stated that in recent months, 50-90 calls per month have concerned a homeless individual, while approximately 500 calls in the last year (approximately 1.5% of the annual total) concerned a local shelter and day services center for homeless individuals. Marietta Police Department estimated that approximately 50% of all officers' time is spent dealing with homeless issues. However, the department's dedicated homeless liaison officers will usually spend seven hours of an eight-hour day dealing with issues related to homelessness.

Co-Responder Teams

Co-responder teams consist of mental health professionals who provide direct support to law enforcement officers responding to incidents involving individuals experiencing behavioral health issues. Local law enforcement agencies generally utilize co-responder teams to divert individuals from the criminal justice system and connect them with housing assistance, mental health services, or other services. While these teams may assist both the general population as well as those experiencing homelessness, some police departments indicated the emphasis on the homeless population has grown in recent years. Examples are described below.

- The Columbus Police Department has a licensed clinician (also referred to as a crisis counselor) on call to assist police encountering homeless individuals and de-escalate when necessary.
- The Marietta Police Department has a Behavioral Health, or "Co-responder," unit consisting of one officer and a behavioral health clinician. The co-responder unit responds to calls involving mental health crises or substance abuse concerns. Depending on the severity of the situation, the officer and the clinician can order the individual to be transported to a medical facility or connect the person to resources; the unit will follow up after the initial contact. The unit is funded with American Rescue Plan Act funds (\$200,000 for two years), though the Marietta Police Department believes the Justice and Mental Health grant administered by the U.S. Department of Justice may replace these funds in the future.
- The Athens-Clarke County Police Department's co-responder program began in August 2016 to assist officers in more complicated calls. The program involves forming teams that pair an officer with a licensed clinical social worker to evaluate whether the individual needs to be involuntarily committed. The department reported the program received approximately \$900,000 from the Justice and Mental Health grant.

Community Outreach

Some local law enforcement agencies conduct various community outreach activities to assist individuals experiencing homelessness. For example:

- The Atlanta Police Department's HOPE (Homeless Outreach Prevention and Engagement) team primarily works to identify and eliminate all homeless encampments by coordinating with local nonprofits to place homeless individuals in short- or long-term housing. The team also utilizes crisis intervention training techniques (discussed below) to de-escalate situations involving individuals experiencing mental illness.
- The Marietta Police Department's homeless liaison officer reported that he engages with unsheltered individuals living in wooded areas. He distributes a flyer that lists service providers and resources and attempts to connect these individuals to housing whenever possible.
- The Chatham County Police Department operates a homeless outreach program with one officer assigned to making contact with the homeless community. The officer provides information on resources related to homelessness to individuals in need.

Crisis Intervention Training (CIT)

The CIT program is a 40-hour course curriculum approved by the Georgia Peace Officer Standards and Training Council. The training is presented by the Georgia Public Safety Training Center in collaboration with DBHDD and the Georgia Chapter of the National Alliance on Mental Illness.

While not a required training, several local law enforcement agencies reported their officers have participated. In Athens-Clarke County, for example, CIT is required for officers wishing to move up in rank, though staff indicated it has become more common to enter the department with this training. Homelessness related teams in Atlanta, Columbus, and Marietta (described above) also send their officers to the training.

Finding 7: The state’s grant administration process is primarily based on federal requirements.

The state administers a significant amount of federal grant funding to service providers. As such, grant administration processes are primarily based on federal requirements. Additionally, the state-funded program we reviewed has policies and processes in place that cover the selection, funding, and monitoring of service providers.

State agencies distributing grant funds have an obligation to ensure that recipients adequately perform all agreed upon services. Additionally, the adoption of best practice approaches in the selection, funding, and monitoring of grantees ensures resources are used appropriately and desired outcomes are achieved.

We reviewed state entities’ grant management practices related to federal and state awards to service providers (as subgrantees). Administration practices are discussed below.²²

State Management of Federal Funds

Between fiscal years 2018 and 2023, the state managed approximately \$157.5 million (29% of \$549.9 million)²³ in federal funds distributed to subgrantees for the HOPWA, ESG, PATH, and PSH (formerly Shelter Plus Care) programs. DCA performs grant administration functions for three programs (HOPWA, ESG, and PSH), while DBHDD distributes PATH funds.

The process for administering federally funded programs is determined by each program’s applicable federal regulations, which guide the state’s selection, monitoring, and reporting activities. As described below, programs have similar requirements in each area.

- **Selection** – Grantee selection at a minimum requires review of applications and related documentation (e.g., tax documentation, financial audits, board meeting minutes, and financial procedures manual). Selection for HOPWA and PSH is non-competitive, meaning providers are recruited to apply and selected if they meet all eligibility requirements. By contrast, PATH and ESG providers are selected based on competitive scoring—PATH providers are selected based on their prior experience, plans for services, and financial plan. ESG providers are selected based on scores related to their ability to reach target populations, type of services offered, project goals, and staffing.

²² This review of grant administration is limited to funds administered by the state. We did not review grants to service providers (which totaled \$213 million) or local governments (which totaled \$214 million) administered by the federal government.

²³ The amount reported (\$157.5 million) includes all state agency disbursement of federal funds for the HOPWA, ESG, and PSH programs, as well as all expenditures using federal funds for the PATH program. This represents 29% of the \$549.9 million available for the HOPWA, ESG, PATH, and CoC programs; the PSH program was consolidated into the CoC program when it was created in 2009)

- **Funding** – The application process for all programs requires a budget template, though PATH applicants must also provide a narrative explaining why the amount was requested and how it will be used. Applicants project the amount needed to implement the program; however, final award totals may be revised at DCA or DBHDD’s discretion based on the amount of funding available and each agency’s estimate of project need.

For all programs, funds are distributed to providers on a cost-reimbursement basis in which providers submit invoices and supporting documentation for expenditures. Agency staff are responsible for reviewing invoices and documentation to ensure expenditures are appropriately documented prior to approving costs and issuing payment.

- **Monitoring** – Monitoring generally refers to activities intended to ensure compliance with program regulations and effective service delivery as specified by the grant agreement. For federally funded programs, responsibilities may be delineated across federal and state agencies. For example, both DBHDD and the Substance Abuse and Mental Health Services Administration are responsible for monitoring PATH grantees.

Monitoring activities may vary across programs but generally include an initial risk assessment to determine each provider’s monitoring needs. State agency staff conduct an annual review of financial information, procedures, and other documentation, which can include the HUD checklist. Additionally, all grantees receiving more than \$750,000 are subject to annual audits.²⁴ PATH providers are also subject to monthly review of HMIS data, as well as annual onsite visits and review of performance reports. Failure to comply with program requirements could result in a warning letter, and repeated violations could result in other enforcement actions, including repayment of funds.²⁵

- **Reporting** – All federal grant programs require participants to submit data at defined intervals. For example, PATH providers submit HMIS data monthly to DBHDD through the PATH Data Exchange (e.g., number of individuals served, services provided, housing outcomes), while ESG providers submit a comprehensive annual performance and evaluation report that provides program results to DCA. Similarly, HOPWA providers submit an annual report containing HMIS data to DCA, and this information is used to create a consolidated report that goes to HUD.

DBHDD also uses the HMIS data submitted by providers to track their

²⁴ *The Single Audit Act (2 CFR § 200.500-200.521) requires an annual audit of non-federal entities that expend \$750,000 or more of federal financial assistance in a fiscal year. It includes an audit of an organization’s financial statements and an evaluation of compliance with federal award requirements (which often assesses the effectiveness of award spending and evaluates performance progress).*

²⁵ *Enforcement actions may include a delay in reimbursements, withholding of funds, reduction in grant amount, repayment of awarded funds, and suspension from program participation.*

progress toward meeting specific performance metrics. During the renewal process, providers are evaluated to determine whether they can continue to participate in the program. Example metrics include the number of new persons contacted and enrolled for PATH, number of persons provided with emergency shelter (ESG) and number of households provided with short-term rental assistance (HOPWA).

PATH, ESG, and HOPWA each have performance metrics to monitor progress toward accomplishing overall program goals. DCA reports the results for ESG and HOPWA performance metrics in its Comprehensive Annual Performance and Evaluation Report. In 2022 (the most recent performance report available), PATH, ESG and HOPWA met or exceeded at least two of their four respective performance goals (see **Exhibit 20**). PSH, which does not have metrics, submits reports that provide program outputs to DCA annually.

Exhibit 20

PATH, ESG, and HOPWA Met or Exceeded Most Program Goals (2022)

Performance Metric	Goal	Result
Projects for Assistance in Transition from Homelessness (PATH)		
Total number of new persons contacted this reporting period	2,763	2,891
Number of homeless persons newly enrolled in PATH services	1,796	1,754
Number of contacted homeless persons who attained mental health services via PATH referral	1,348	890
Number of persons transitioned to temporary, permanent or institutional housing	899	1,034
Emergency Solutions Grant (ESG)		
Number of units provided in overnight homeless person shelters	8,936	9,588
Number of persons or households contacted during outreach activities	1,019	983
Number of persons or households assisted with homeless prevention	181	365
Number of units provided in tenant-based rental assistance/rapid rehousing	955	1,150
Housing Opportunities for Persons With HIV/AIDS (HOPWA)		
Short-term rent, mortgage, and utility assistance to prevent homelessness	141	209
Tenant-based rental assistance	263	236
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	68	34
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	61	93
Source: 2022 DCA Comprehensive Annual Performance and Evaluation Report, DBHDD		

State Management of State Funds

Between fiscal years 2018 and 2023, the state spent \$158.4 million for homeless programs and services. This review focuses on the Reentry Partnership Housing (RPH) program, which accounts for \$5.0 million of state expenditures (see text box on the next page for state-funded programs not included). RPH provides short-term housing assistance to individuals recently released from prison and is jointly managed by DCS and DCA.

State funding allocated for two programs was not included in this review

Approximately \$122.7 million in state funds was for the Georgia Housing Voucher and Bridge Funding Program, which provides housing vouchers and rental assistance to individuals experiencing homelessness who have been diagnosed with severe and persistent mental illness. This program was excluded from this review of grant administration because DBHDD provides vouchers to eligible tenants and pays landlords directly for the tenant's rent.

Approximately \$12.6 million allocated to the State Housing Trust Fund was disbursed to local governments and service provider organizations. These funds are not included because they reflect funds provided to these entities to meet match requirements for various federal programs discussed in Finding 1. This includes ESG and PSH, which are managed by state entities and follow federal administration requirements described above. Other disbursements are related to federal programs not discussed in this funding because they are administered by federal entities.

Because RPH is created and primarily funded by the state, it is not subject to federal grant requirements. Rather, the state has determined how to administer the program. Similar to federal programs, the state has processes in place to select and monitor funding recipients. It should be noted that we reviewed the state's processes as described in program policies but did not test the execution of these processes.

- **Selection** – Similar to HOPWA, RPH grantees are selected based on a non-competitive application process. To be eligible for RPH funding, applicants must submit documentation that demonstrates their experience in providing housing and/or related supportive social services to special needs populations (e.g., sex offenders, offenders with certain mental illnesses). Applicants must also demonstrate that they meet all local housing and zoning requirements and comply with use and occupancy permits. Selection also considers each applicant's capacity, which is determined after an evaluation of their organizational and financial documentation. Applicants that meet all eligibility requirements are approved and certified to provide housing.
- **Funding** – When a potential client is being prepared for release, DCS selects a service provider based on the client's needs. The fee coverage period begins on the date the client arrives; the service provider can then submit requests for payment for the clients served. Grantees are reimbursed monthly expenses for providing room and board to clients. Providers receive \$750 to \$850 per month, depending on the client's needs.
- **Monitoring** – DCS and DCA share responsibility for monitoring grantees actively housing RPH participants. DCS ensures RPH grantees undergo an annual background check, reviews monthly financial reports, and conducts annual facility compliance checks, which include client interviews and property inspections. DCA is responsible for contract monitoring for each provider. When there is

non-compliance (e.g., guideline infractions, failure to cooperate during site visits, illegal activities), DCS staff can impose sanctions, including suspension or removal from the program. Criminal charges may also be filed against grantees when appropriate (e.g., attempting to submit invoices with false or misleading information).

- **Reporting** – While DCS does not require grantees to report specific program outputs or outcomes, grantees are required to maintain and report client entry and exit dates. DCS reports that they periodically collect and verify this information. Since these are short-term placements with providers, additional reporting requirements for grantees may not be as necessary as in other programs.

DCS compiles program-wide metrics in a monthly dashboard that is shared with partners (DCA, CACJ, and GDC). The dashboard includes data such as the number of providers, number and type of participants, source of referrals, and monthly expenditures. The dashboard does not report ultimate client outcomes, including whether they exit to permanent housing. However, it should be noted RPH is part of a broader reentry program designed to reintegrate ex-offenders into the community.

DCA's Response: *DCA noted its agreement with the finding.*

Finding 8: While CoCs and service providers use HMIS to meet HUD requirements, its use to improve homeless service delivery statewide is not currently maximized.

CoCs and service providers generally use the Homeless Management Information System (HMIS) for data collection and reporting as required by HUD. However, its use as a management tool to understand trends and inform decision making varies across providers and CoCs. Additionally, it is not used to understand changes in homelessness at the statewide level.

HMIS is the most comprehensive source of information available on individuals and families who are homeless or at risk of homelessness in Georgia, though data limitations exist (see text box on the next page). CoCs, local service providers, and other coordinated entry access points routinely collect client-level data at various points throughout the year (at entry, exit, and while receiving services). Data collected includes demographic information on each client, as well as information on the housing and services they receive. This and other relevant information is ultimately reported to HUD and used by a variety of organizations to evaluate and make decisions about service delivery.

While HMIS's primary use is to satisfy HUD's data collection and reporting requirements, it is also generally viewed as a reliable source of information on

changes in the homeless population. Full participation in HMIS by service providers and regular additions and updates to client-level information allow the data to be analyzed in a number of ways and aggregated to identify trends by subpopulations, project types, and within set geographic boundaries (by CoC or statewide). Over a 10-year period (2013 to 2023), service providers entered approximately 460,000 clients into the system.

The HMIS can serve a variety of purposes for users at the provider, CoC, and statewide levels. As described below, HMIS is used to varying degrees and in some cases is likely not maximized.

HMIS Implementation Challenges

While HMIS is the most comprehensive source of data that can be used to identify trends in the homeless population and the services provided, we identified implementation issues that impact data completeness, as discussed below.

- Not all providers use HMIS - Based on our survey, 9 of 112 service providers surveyed reported not using HMIS, primarily because it was not required for funding purposes. In addition, some state-funded programs do not require providers to use HMIS. For example, the Reentry Partnership Housing program (RPH) does not report its clients or available beds in HMIS.
- Missing data on clients – Based on our review of a selection of Annual Performance Reports submitted by 61 service providers, some client records were missing key data elements (e.g., social security number, date of birth). Of 112 service providers surveyed, 53 (47%) reported clients withholding or providing inaccurate information as challenges to entering client information into HMIS. Missing such key data fields makes it difficult to analyze information to identify service gaps.
- No centrally managed HMIS – The management of two separate HMIS's (statewide HMIS and Columbus CoC implementations) could lead to duplication when there is no mechanism to fully integrate them. Without integration, a client served in the Columbus CoC region could travel to one of the other eight CoC regions and not be identified as an existing client. According to DCA staff, fully integrating the two systems would be cost prohibitive.

We were unable to determine the magnitude of these issues across the state or the extent to which they would impact the results of any analysis.

Service Providers

As the final recipients of HUD awards (\$352.4 million in federal fiscal years 2018-2022 as noted in Finding 3), service providers are required to use HMIS to collect information on individuals served and annually report on funded projects. Service providers also report using HMIS to manage programs and services, though the extent to which this occurs varies.

We surveyed service providers affiliated with the state's nine CoCs to obtain information about their use of HMIS to collect client information, report information to HUD, and make decisions about their own operations. Of the 304

providers identified by CoCs as partners in the delivery of homeless programs and services, 112 (37%) responded to our survey, including 9 that reported they do not use HMIS because they are not required to do so (e.g., they do not receive federal funds).²⁶

While all homeless service providers are encouraged to enter data into and utilize HMIS, many are required to enter data and run reports—either as a stipulation of federal funding²⁷ or because their CoC has mandated its use even when federal requirements have not. We determined that service providers were generally meeting their data collection and reporting requirements.

HMIS can also be used to assist providers in their service delivery. Based on survey responses, the extent to which HMIS is used for this purpose varies, as described below.

- **Assess performance of organization’s services** – Most respondents (78 of 102, or 76%) reported using HMIS to determine how well services are operating. One service provider indicated their organization uses HMIS to determine the number of active clients enrolled in their programs on a weekly basis. Another service provider—which also serves as the lead agency for the CoC—reported tracking the number of people entering and exiting and the length of time in the program.
- **Expand or reduce types of services provided** – The majority of respondents (63 of 102, or 62%) reported using HMIS data to determine whether services provided are adequate to meet client needs. For example, one service provider reported using HMIS to track utilization of services such as access to showers, personal storage, and transit passes, which they indicated helps determine the need to increase or reduce services.
- **Identify services best suited for clients** – Half of respondents (52 of 102, or 51%) reported using information in HMIS to determine the availability of services offered by other organizations in the same CoC region. This is possible when providers (mainly those serving as coordinated entry access points) can view services available from other providers in HMIS.²⁸

Of those that reported not using HMIS for the purposes above, more than 40% did not find the functions useful or necessary for service provision, as shown in **Exhibit 21**. Additionally, approximately 20% of respondents noted other reasons for not using HMIS that included not being aware of the functionality or

²⁶ One additional respondent—a local government—was excluded because it is not a service provider.

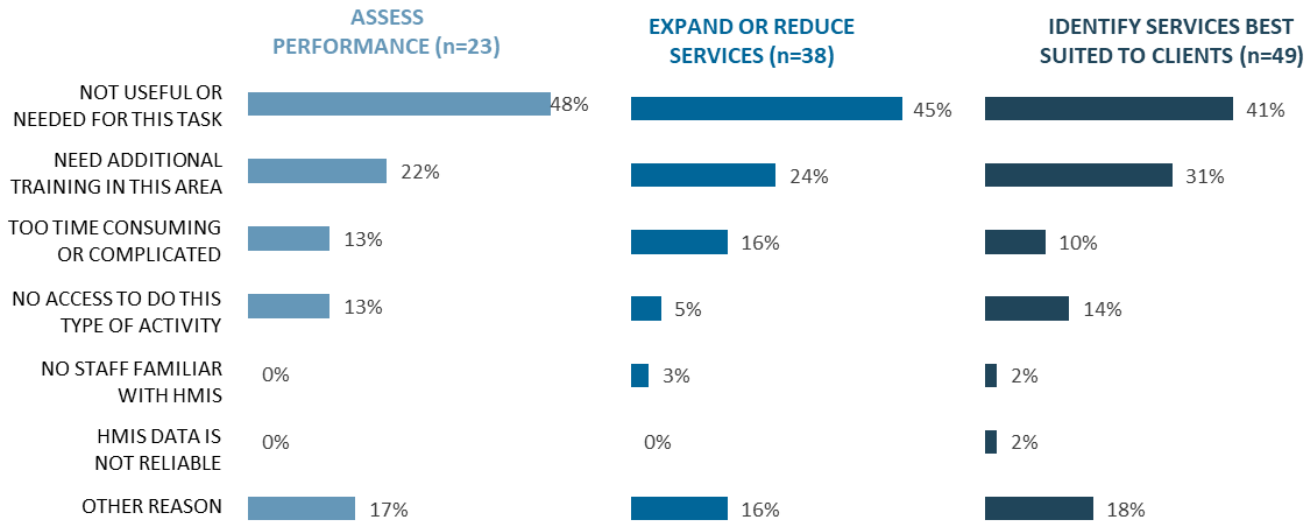
²⁷ Service providers that receive Emergency Solutions Grants, Community Development Block Grants, and CoC Program funding are mandated to enter client data, as well as submit HMIS reports to retain and qualify for future federal funding.

²⁸ Because Georgia’s HMIS is an “open system,” providers can view services clients **received** from other providers in the state (with the exception of Columbus, which operates its own HMIS). Not all service providers have access to view services **available** in other areas or within the same CoC region.

using a different database to achieve the stated purpose. For example, one provider noted that their organization’s database did a better job of indicating what services were most appropriate for its clients than HMIS.

Exhibit 21

Survey respondents reported various reasons for not using HMIS for specified purposes



Source: DOAA Survey

Continuums of Care (CoCs)

CoCs are responsible for ensuring service providers receiving HUD funds for homeless services utilize HMIS and meet HUD’s data quality standards. According to federal regulations, CoCs should also track and manage the homeless community in their area through homeless population and housing inventory counts, both of which provide the CoC with an overview of homelessness in its region and information on whether current services are effective or additional resources are needed. Most CoCs reported using HMIS for this purpose.

HUD requires CoCs to submit various reports²⁹ annually, and CoCs have generally complied with these requirements. Additionally, CoCs must review service providers’ performance against established benchmarks (e.g., data quality or completeness, participating in coordinated entry, program utilization rate) during grant renewal. All nine CoCs have access to the data and reported consistently using it to monitor service providers’ performance in accordance with their policies and procedures.

Per HUD, CoCs can also use HMIS to analyze data at both the system and project levels (e.g., permanent supportive housing, transitional housing), as well as evaluate outcomes by subpopulation and across project types. All CoCs reported

²⁹ These reports include the System Performance Measures and Longitudinal System Analyses. Both of these include indicators such as the length of time people have been homeless, returns to homelessness over time, and exits to permanent housing, but for individuals versus households.

using HMIS to inform decision making in their region. For example:

- The Columbus CoC reported identifying decreasing utilization within a male only shelter in its region, while the need for shelter increased for families with children. Using data, the CoC indicated it was able to illustrate to the provider the need to serve families with children exclusively in their facility.
- The Atlanta CoC created publicly available dashboards that display aggregated HMIS data on outcomes by project type for the system as a whole and by provider. The dashboards allow for transparency, including the CoC's outcomes against established goals (e.g., returns to homelessness, median of all projects' average days between enrollment and move-in). This CoC utilized its third-party contractor to develop the dashboard.
- As the Balance of State CoC lead, DCA staff reported using HMIS data to describe the services provided in communities by organization. This allowed the CoC to identify service provider shortage areas and redirect resources to existing providers in surrounding areas to expand their networks. Because the Balance of State includes the majority of Georgia counties (though not all metro areas), this practice could serve as a model for a statewide approach, which currently does not occur (as discussed below).

While all CoCs reported using HMIS data for decision making, practices can vary. Some CoCs can maximize the usefulness of HMIS because they are able to hire staff or contract with vendors. This is largely driven by funding levels—nonprofits can raise additional funding, while some large local governments (e.g., Fulton County) have contributed significantly more than their required match for HMIS. One CoC described the desire to hire a staff person dedicated to HMIS (to analyze data, provide technical assistance, and recruit new service providers to participate); however, it is limited by current funding levels.

Statewide

Currently, HMIS is not used to analyze statewide conditions and needs of Georgia's homeless service delivery system. Several other states use HMIS data for statewide analysis, which is critical to describe the nature and extent of homelessness; assess service usage, effectiveness, and gaps; and support informed decision making.

Though not required, HMIS guidance recommends the system be used to conduct statewide analyses of the characteristics and service needs of people experiencing homelessness, along with service barriers. HMIS can also be used to measure the effectiveness of various interventions in reducing or preventing homelessness statewide. This is similar to how it is used by service providers and CoCs, but for the state as a whole.

We reviewed other states' use of aggregated HMIS data to conduct statewide analyses. These analyses are typically conducted by interagency councils on homelessness or state offices dedicated to addressing homelessness. In these states, analysis is often done by third-party vendors with HMIS expertise, though a few states have dedicated data analysts on staff.

As discussed in the examples below, statewide analysis of HMIS has helped states manage resources, make informed policy decisions, and identify effective strategies to achieve the goal of ending or preventing homelessness.

- **Wisconsin** – Wisconsin's HMIS data is used to generate statewide dashboards that show monthly statistics on clients served and housing outcomes. The dashboard also shows trends for select performance measures (e.g., total clients served, exits to permanent housing, clients newly experiencing homelessness, and returns to homelessness after exiting to permanent housing).

In addition, HMIS data is used to generate a separate dashboard that analyzes the rate of homelessness by race and ethnicity to identify disparities within programs, across regions and statewide. According to the director of the state's Interagency Council on Homelessness, they now use a tool to identify inequities across all state programs, including housing assistance programs. As issues are identified, recommended changes to policies that perpetuate inequities will be reported to decision makers.

- **Colorado** – Led by the state Office of Homeless Initiatives in collaboration with other federal, state, and local partners, Colorado launched a real-time database that tracks progress toward preventing homelessness across the state. This effort is part of a nationally recognized model³⁰ that focuses on using person-specific data (supported by HMIS) to measurably reduce homelessness in the state.

Colorado also plans to use HMIS data to conduct a statewide homelessness landscape analysis, which will help identify funding gaps and assess which strategies most effectively and equitably address homelessness. The information gathered through this analysis is expected to inform Colorado's policies, investments, and implementation of future homelessness strategies.

- **Washington** – Washington State's Department of Commerce uses aggregated, statewide HMIS data to produce several reports and publications. For example, using HMIS data cross-matched with the state Department of Social and Health Services data, the Department of Commerce assessed service trends among homeless clients compared to non-homeless clients and other subpopulations (e.g., disabled).

We identified similar statewide dashboards on homelessness and racial disparities in additional states, including Alaska, New Hampshire, North Dakota, Vermont, and Wyoming.

³⁰ Known as "functional zero," the goal is to achieve the point when a community's homeless services system is able to prevent homelessness whenever possible and ensure that when homelessness does occur, it is rare, brief, and one-time.

Washington State also has an online dashboard that includes information describing homeless activity at both the state and local levels. The dashboard offers “county report cards” that include data describing the performance of the operations offered by individual counties. Washington compares each county’s actual performance against the state’s established benchmarks, which informs an interactive map that allows users to review performance outcome results for the reporting period.

Unlike other states, no entity has been assigned responsibility for analyzing HMIS data statewide in Georgia. As the HMIS lead for the statewide implementation (excluding Columbus), DCA is primarily responsible for overseeing the system, guiding HMIS policy development, and coordinating user training. It should be noted that in its capacity as lead agency for the Balance of State CoC, DCA reported that it is conducting these types of analyses for its coverage area (which covers 152 of 159 counties). However, the Balance of State is not representative of the conditions and needs of other more populous areas with higher concentrations of people experiencing homelessness.³¹

RECOMMENDATION

1. Should the General Assembly decide to establish a statewide entity to coordinate the state’s response to homelessness (as discussed in Finding 9), it should consider requiring the council to use HMIS to conduct statewide analyses of homelessness conditions and trends.

DCA’s Response: *DCA partially agreed with the finding, noting that while it agrees that “any statewide coordination would be best served by leveraging the HMIS data from all nine Georgia Continuums of Care”... “coordination may require new funding with a specific mandate for information sharing.”*

Finding 9: While a significant amount of funding is used to serve Georgia’s homeless populations, the state lacks a coordinated, strategic response to address the problem.

Though a significant amount of activity occurs locally, Georgia has not developed a comprehensive strategy to prevent and address homelessness. Georgia’s approach to homelessness is decentralized, which—while tailored to meet the specific needs of local communities—introduces risks such as possible duplication of efforts. Other states have designated an entity responsible for

³¹ Balance of State CoC primarily consists of rural counties and accounts for 55% of the state’s 2022 Point-in-Time count.

managing implementation of a statewide strategic plan that includes measurable goals designed to help ensure stakeholders coordinate efforts and use cost-effective, comprehensive approaches to address homelessness.

Currently, strategies and actions to address homelessness in Georgia are concentrated at the local level because no single entity is responsible for coordinating activities related to homelessness. DCA is considered the lead housing agency for the state; however, its responsibilities also include administering programs and resources related to local government assistance and community and economic development (consisting of more than 70 programs and resources). Other state entities—DBHDD, DCS, and CJCC—also administer housing programs that serve people experiencing or who are at risk of homelessness. Additionally, while the nine CoCs across the state are responsible for coordination and collaboration among stakeholders, they are generally focused on their own communities.

USICH was established by Congress in 1987 to coordinate the federal government's response to homelessness and support state and local efforts to prevent and end homelessness.

The United States Interagency Council on Homelessness (USICH) recommends every state and territory establish a State Interagency Council on Homelessness (by governor's executive order or legislative authority), which can assist states in coordinating their response to homelessness. In addition, a 2022 Georgia Senate Study Committee on Unsheltered Homelessness recommended that a statewide senior leadership position be created in the governor's office and charged with facilitating coordination across public, private, and nonprofit partners impacting housing and unsheltered and sheltered homelessness.

Georgia's Interagency Homeless Coordination Council

In February 2004, an executive order established a council on homelessness in Georgia, but we could not find evidence that it still exists. The Interagency Homeless Coordination Council was co-chaired by the Department of Human Resources (now Department of Human Services) and Department of Community Affairs. It included representatives from various state agencies and homeless service agencies.

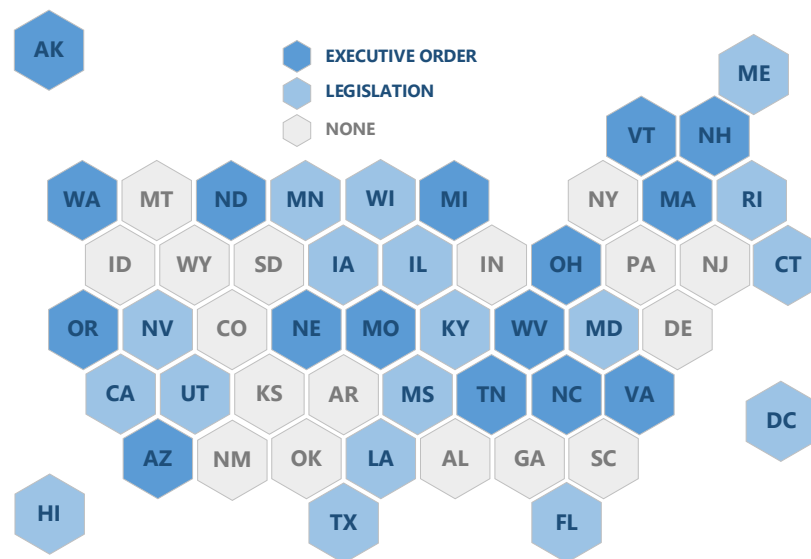
According to the executive order, the council had the following responsibilities:

- Pursue available federal funding to support implementation of the state *Homeless Action Plan to End Chronic Homelessness in 10 years*, which included six strategic goals and action steps to guide the state's efforts.
- Review and recommend measures to improve state-administered mainstream service programs (e.g., Medicaid, TANF, SSI, CHIP, Workforce Investment Act, Food Stamp program, and Veteran's Healthcare and benefits).
- Review and recommend measures to establish state policies that assure appropriate housing and community treatment for individuals with disabilities discharged from institutional settings.
- Review the state plan and present recommendations on the implementation strategy.
- Work jointly with the Governor's Office of Planning and Budget to conduct a cost/benefit analysis of supportive housing programs and prepare a cost projection of the cost to implement the plan.

Nationally, 33 states have active, state-run interagency councils;³² as shown in **Exhibit 22**, this includes other southeastern states. Interagency councils typically consist of key stakeholders that include state agencies that routinely interact with individuals experiencing homelessness (e.g., healthcare, behavioral health, human services, veterans, housing, corrections, education, transportation, labor), local and community partners, and persons with lived experience of homelessness. Approximately half of the councils (17) are established by an act of the legislature; 16 councils are established by executive order, which can be rescinded or superseded by new orders with changes in administrations.

Exhibit 22

Most States Have Established Councils Dedicated to Homelessness



Source: PAD analysis of Lexis+ and other state websites

Interagency councils (and other coordinating entities) are engaged in a variety of activities to meet their states' specific needs. Common activities—as recommended by the USICH—include developing and overseeing strategic plans³³ to prevent and end homelessness; recommending policy, regulatory, and resource changes needed to accomplish the objectives outlined in the plan; issuing annual reports on progress; and disseminating data.

We reviewed four states³⁴ that have adopted common practices associated with a strategic approach to homelessness. As discussed below, these states have taken actions that demonstrate a more unified response to homelessness.

³² The District of Columbia also has a council that is statutorily authorized. Some states (Utah, Colorado, Utah, Washington) have separate homelessness offices (often housed in state agencies with dedicated staff) that lead statewide coordination efforts and/or support the work of the state Interagency Council on Homelessness.

³³ State plans are also viewed as tools to assess overall needs, coordinate resources, and promote best practices within the system.

³⁴ We reviewed Colorado, Utah, Washington, and Wisconsin.

- **Strategic Planning** – All states we reviewed have developed strategic plans that outline priorities for addressing homelessness. These plans generally contain a vision statement or set of guiding principles, assessment of the current state of homelessness, strategic goals, and action steps or strategies to achieve goals.

No statewide strategic plan has been developed to address homelessness in Georgia since 2002, and CoCs have prepared strategic plans to varying degrees. Of the nine CoCs in the state, five (Athens-Clarke, Atlanta, Augusta-Richmond, Columbus, and Chatham-Savannah) have developed strategic plans to address homelessness for their respective regions.³⁵

- **Collaboration** – Partnerships between state agencies, local governments, service providers, and other stakeholders can be useful in addressing certain service delivery challenges. For example, service providers in Georgia have identified barriers to accessing mainstream programs, such as TANF, Medicaid, SSI/SSDI, SNAP. In Colorado, state entities (housing and health departments) have partnered to examine program requirements in an effort to remove barriers for eligibility.

It should be noted that Georgia CoCs have representatives on an HMIS steering committee³⁶ that meets regularly; however, this committee is primarily focused on the management and functionality of HMIS and does not involve all possible stakeholders.

- **Resource allocation** – In Utah, statewide planning has enabled more efficient allocation of state resources. According to the State Homeless Coordinator, the statewide strategic plan has helped guide decisions about how it uses the approximately \$98 million in total state managed funds for homelessness services.³⁷ The plan has also helped identify areas with the greatest need, ensuring that funding and services are distributed where they can have the most significant impact. While a portion of Georgia's State Housing Trust Fund provides matching funds for federal grants, a statewide strategic plan could help ensure funds are directed toward best practice interventions.
- **Statewide policies** – In Wisconsin, one statewide strategy is to identify racial and ethnic disparities in homelessness across the state. This helped determine the need for policies to ensure fair and equitable treatment, particularly in areas that perpetuate homelessness or the risk of homelessness among people of color.

³⁵ Strategic plans for the remaining CoCs (Cobb, DeKalb, Fulton, and the Balance of State) are not yet developed.

³⁶ Though it can participate, the Columbus CoC is not a voting member of the steering committee because it manages its own HMIS implementation, as discussed on page 39.

³⁷ Figures are for fiscal year 2023 and include approximately \$32 million in state funds, \$5 million in local funds, and \$61 million in federal funds (\$56 million were one-time federal funds).

Additionally, other states have taken official stances or formally implemented best practices or federal policies (e.g., Housing First). Without an entity responsible for providing such guidance (or federal directives as part of grant conditions), CoCs and local providers determine on their own how to prioritize certain goals or initiatives.

- **Data collection and analysis** – In four states, a statewide approach has encouraged the collection/aggregation and analysis of data on homelessness trends. Statewide dashboards have also been created to help identify patterns among various subgroups and target solutions to specific populations. Conversely, statewide analysis of client-level data housed in HMIS does not occur in Georgia, as discussed in Finding 8.

RECOMMENDATION

1. If the General Assembly wants a more strategic approach to address homelessness, it could consider establishing a council responsible for statewide coordination, as has been done in other states.

DCA's Response: *DCA partially agreed with the finding, noting that “the state leverages HUD’s Continuum of Care structure to address homeless concerns,” which provides “a degree of cooperation among the nine Continuums of Care, particularly in metropolitan Atlanta.”*

DCA also noted that state agencies such as DCA, DBHDD, and DCS “coordinate regularly to maximize limited resources and address statewide homelessness needs.” In addition, DCA indicated that “through the ongoing efforts of the Behavioral Health Coordinating Council, we work together to educate the public on the need for supportive housing.” According to DCA, the council includes a working group on homelessness” and “plans are in place to expand the working group to a subcommittee that would engage state agencies and other Continuum of Care representatives.”

Appendix A: Table of Findings and Recommendations

	Agree, Partial Agree, Disagree	Implementation Date
Finding 1: Between federal fiscal years 2018 and 2022, an estimated \$706.3 million in federal funds was available for homeless programs and services. (p. 11)	Partial Agree	N/A
No recommendations included		
Finding 2: Approximately 78% of federal funds available has been spent on homelessness programs and services. (p. 16)	Partial Agree	N/A
No recommendations included		
Finding 3: As the final recipients of federal funding, service providers spent approximately \$352.4 million to directly serve homeless populations between fiscal years 2018 and 2022. (p. 21)	Partial Agree	N/A
No recommendations included		
Finding 4: Expenditures of state funds for homeless programs fluctuated between fiscal years 2018 and 2023. (p. 24)	Partial Agree	N/A
No recommendations included		
Finding 5: Most local government survey respondents reported they did not spend their own funds on homelessness programs in 2022. (p. 28)	N/A	N/A
No recommendations included		
Finding 6: Law enforcement agencies do not track expenditures but reported performing certain activities to address homelessness during their normal duties. (p. 31)	N/A	N/A
No recommendations included		
Finding 7: The state's grant administration process is primarily based on federal requirements. (p. 34)	Agree	N/A
No recommendations included		
Finding 8: While CoCs and service providers use HMIS to meet HUD requirements, its use to improve homeless service delivery statewide is not currently maximized. (p. 38)	Partial Agree	N/A
8.1 Should the General Assembly decide to establish a statewide entity to coordinate the state's response to homelessness (as discussed in Finding 9), it should consider requiring the council to use HMIS to conduct statewide analyses of homelessness conditions and trends.	N/A	
Finding 9: While a significant amount of funding is used to serve Georgia's homeless populations, the state lacks a coordinated, strategic response to address the problem. (p. 44)	Partial Agree	N/A
9.1 If the General Assembly wants a more strategic approach to address homelessness, it could consider establishing a council responsible for statewide coordination, as has been done in other states.	N/A	

Appendix B: Objectives, Scope, and Methodology

Objectives

This report examines Homeless Spending. Specifically, our examination set out to determine the following:

1. What funds were available from federal, state, and local fund sources to spend on homeless programs and services?
2. How were funds for homeless programs and services spent?
3. To what extent have grants and contracts been effectively used to award homeless funds and monitor service delivery?
4. To what extent does the Georgia Homeless Management Information System assist in improving homeless service delivery?

Scope

This performance audit generally covered activity related to Homelessness Spending during fiscal years 2018-2022, with consideration of earlier or later periods when relevant. We selected this time period because it was the most recent period with complete information available (state fiscal year 2023 information was not available until after our review began, and federal fiscal year 2023 did not end until September 30, 2023). Information used in this report was obtained by reviewing relevant laws, rules, and regulations, as well as agency documents. We interviewed staff from the Department of Community Affairs (DCA), other relevant state agencies (including state law enforcement), and the U.S. Department of Housing and Urban Development (HUD). Finally, we reviewed websites for four states identified as having a strategic response to homelessness and interviewed relevant staff as needed.

The audit team contacted officials in each of the nine Continuum of Care (CoC) geographical areas. The team interviewed CoC lead agency staff and conducted site visits to one or more service providers in each CoC geographical area. During these site visits, the audit team interviewed provider staff and, when possible, toured facilities used to provide housing and support services. We also interviewed local government officials, including local law enforcement officers.

When possible, we focused our review on areas with substantial homeless populations. For purposes of this review, we defined areas with substantial homeless populations as counties with 100 or more homeless people based on 2022 Point in Time count data. The Point-in-Time (PIT) count, which CoCs conduct to meet HUD requirements, is a count of sheltered and unsheltered people experiencing homelessness on a single night in January. Using this data, we identified 19 areas with substantial homeless populations. In our analysis of local government spending, we also included five cities in these counties (Atlanta, Brunswick, Decatur, Marietta, and Savannah).

Government auditing standards require that we also report the scope of our work on internal control that is significant within the context of the audit objectives. We reviewed internal controls as part of our work on Objective 3. Specific information related to the scope of our internal control work is described by objective in the methodology section below.

Methodology

To determine what funds were available from federal, state, and local fund sources to spend on homeless programs and services, we analyzed financial data for fiscal years 2018-2022. To determine what funds were available from federal sources to spend on homelessness, we initially reviewed federal documents, including program guides published by the U.S. Interagency Council on Homelessness and the U.S. Department of Housing and Urban Development to identify federal award programs that provide funding used to address homelessness. We then reviewed all federal award data in USA Spending (the federal government's data source for federal spending data) to identify which federal award programs may exclusively address homelessness or serve the needs of a subset of the homeless population. We researched each of these programs to confirm their purpose and target audience and used this information to develop a list of award programs to include in our analysis of federal funds available to Georgia recipients.

We identified 20 federal award programs for inclusion in our analysis. We used this list of programs to identify federal awards that went to Georgia recipients in federal fiscal years 2018-2022 and calculated the total amount of federal funding available to spend on homeless programs during the period. For the federal award programs administered by state agencies, we interviewed state program staff to understand program administration, funding, and sub-award processes, if applicable. While other federal funds may be used to address homelessness, we did not include these funds if 1) homelessness was not described as part of the program's primary mission, 2) participants do not have to be homeless or at risk of becoming homeless to be eligible for services, or 3) we were not able to isolate funds utilized to address homelessness in the data available. Funds from the Emergency Rental Assistance (ERA) program funded by the U.S. Treasury are not included in our calculations. We assessed the controls over USA Spending data used for this analysis and determined that the data used were sufficiently reliable for our analyses. While we concluded that the information was sufficiently reliable for the purposes of our review, we did not independently verify the data.

To determine the amount of state funds available to spend on homelessness, we analyzed financial data for fiscal years 2018-2022. We interviewed DCA, Department of Community Supervision (DCS), and Department of Behavioral Health and Developmental Disabilities (DBHDD) staff to identify state-funded homeless programs; we also reviewed agency documents, reports, and financial data. For the state agencies identified as receiving and administering federal funds for homeless related programs, we reviewed match requirements to determine the extent to which state funds were required. To calculate the amount of state funds available, we used data from TeamWorks financials, Emphasys financial data from the Georgia Housing and Finance Authority, matching fund data from Criminal Justice Coordinating Council staff, and Georgia Housing Voucher and Bridge Funding Program (GHVP) expenditures as calculated by DBHDD staff.

To determine the amount of local funds available to spend on homelessness, we obtained budgets for local governments in areas with substantial homeless populations. We analyzed these budgets to determine the extent to which they identified funds available for homeless services. In our meetings with CoC lead agencies, we also discussed whether local funds were used for homeless programs in their community.

We assessed the controls over the TeamWorks financial data used for this examination and determined that the data used were sufficiently reliable for our analyses. While we concluded that the information was sufficiently reliable for the purposes of our review, we did not independently verify the data.

To determine how funds for homeless programs and services were spent, we analyzed federal expenditure data for state agencies, local governments, and service providers. For entities with over \$750,000 in federal dollar spending, we obtained expenditure data (funds spent) reported as part of federal Single Audit requirements. We obtained each entity’s Schedule of Expenditures for Federal Awards (SEFA) for fiscal years 2018 through 2022 from the Single Audit Database maintained by the Federal Audit Clearinghouse. Individual entities may have different beginning and end dates for their fiscal year (e.g. January 1 to December 31, July 1 to June 30, etc.). For purposes of this review, we relied on fiscal year data and did not attempt to reconcile it to a calendar year. To determine additional spending since the end of fiscal year 2022, we requested unaudited expenditure information from the state agencies included in this review and the five local governments with the greatest amount of federal pending (Augusta-Richmond County, Dekalb County, Gwinnett County, City of Atlanta, and City of Savannah). We then compiled financial data from these sources for the list of 20 programs identified in Objective 1 for our analysis. Because entities have different fiscal years and reported additional spending as of different dates, the amounts presented represent estimates of federal expenditure. Additionally, it should be noted that spending may occasionally exceed awards for certain entities due to gaps in awards data.

For state agency expenditure of both federal and state funds, we also reviewed TeamWorks financial data and program documents to determine the purpose of the program, its target population, and how much was spent. When available, we also calculated the amount of program funds allocated to administrative activities. While data in the Federal Audit Clearinghouse is not comprehensive because only entities with over \$750,000 in federal spending are required to complete Single Audits—and thus are the only entities reporting SEFA data to the Clearinghouse—we were able to use additional data from sources such as USA Spending to identify spending for most entities.

To determine how local funds were spent, we conducted an online survey of all local governments in Georgia—including counties, municipalities, and consolidated governments—and asked them to estimate the amount of local revenues spent on homeless programs, if any. The survey was distributed through the Georgia Municipal Association and the Association of County Commissioners of Georgia. We collected responses from 204 of Georgia’s 690 local governments (30% response rate). To ensure we obtained information from governments in areas with substantial homeless populations, we contacted these governments directly and asked them to complete the survey or provide expenditure data. We also obtained information regarding local government expenditures by reviewing budget documents and interviewing staff at CoC lead agencies.

To determine the extent to which grants and contracts have been effectively used to award homeless funds and monitor service delivery, we reviewed information about programs identified in Objective 1 to determine which programs the state administers through grant agreements (which for purposes of this review is synonymous with contracts) with service providers. Our review of grant administration did not include the Georgia Housing Voucher and Bridge Funding Program because DBHDD provides vouchers to eligible tenants and pays landlords directly for the tenant’s rent. We also excluded federal grants awarded directly to the final recipient (most often service providers). We limited our review to federal and state grant awards administered by state agencies. We examined the state’s processes for administering these grant programs as described in program guidelines and agency policies but did not test the execution of these processes.

We interviewed DCA's finance and grant compliance managers regarding how these grants are administered and obtained agency documents, including written grant agreements. We also used a questionnaire to compile information from state agencies (DCA, DBHDD, and DCS) responsible for administering the programs. In addition to general information about each program's funding sources and grant cycle, we compiled and reviewed information about the process for selecting providers, distributing funds, monitoring activities, performance goals, and reporting requirements. This included monitoring checklists, program guidelines, grant agreements and score sheets, when applicable. As needed, we also interviewed program staff responsible for administering these programs to discuss grantee performance, compliance, and enforcement actions. This included staff from DCA, DBHDD, and the Department of Community Supervision.

To understand the design and operating effectiveness of DCA's internal controls for awarding grants and contracts, we reviewed DCA's organizational chart and interviewed staff with responsibilities for establishing and overseeing grants and contracts with service providers and other entities administering homeless programs. This includes staff with responsibilities that cover legal, financial management, procurement management, budget development, compliance monitoring, and reporting aspects of grant management. We also interviewed staff at the Georgia Office of the Inspector General regarding its interactions with DCA.

To determine the extent to which the Georgia Homeless Management Information System (HMIS) assists in improving homeless service delivery, we interviewed DCA staff, CoC staff, and service providers about access to and usage of HMIS. Additionally, we interviewed staff of the Georgia HMIS vendor to learn about the system's functions, capabilities, and limitations. We also reviewed documents from HUD, DCA, and the CoCs to identify relevant regulations, policies, and guidance regarding HMIS.

To assess the extent to which service providers use HMIS, we surveyed service providers from each CoC. We emailed surveys to 304 provider staff using contact information provided from their respective CoC. We received 116 responses (38%), though some respondents were excluded. Four respondents representing domestic violence agencies were excluded because they use a different system due to security concerns around client information, while one respondent was excluded from our analysis because they were not a service provider. Additionally, nine respondents were excluded from some analyses because they are not required to use HMIS for HUD funding purposes but use it voluntarily or to satisfy requirements of other funding entities.

To understand the limitations of HMIS data, we reviewed a selection of Annual Performance Reports submitted to HUD by service providers. We analyzed the error rates in these reports for individual data elements (e.g. social security number, date of birth). The results of these analyses informed our conclusions about the extent to which service providers met their data collection and reporting requirements.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

If an auditee offers comments that are inconsistent or in conflict with the findings, conclusions, or recommendations in the draft report, auditing standards require us to evaluate the validity of those comments. In cases when agency comments are deemed valid and are supported by sufficient, appropriate evidence, we edit the report accordingly. In cases when such evidence is not provided or comments are not deemed valid, we do not edit the report and consider on a case-by-case basis whether to offer a response to agency comments.

Appendix C: Counties With Substantial Homeless Populations (2022)

County	Count
Athens-Clarke	283
Augusta-Richmond	549
Columbus-Muscogee	243
Cobb	380
Bartow	117
Bibb	391
Chatham	523
Cherokee	243
Clayton	120
Dekalb	565
Floyd	181
Fulton ¹	2,290
Glynn	283
Gwinnett	269
Hall	479
Lowndes	142
Stephens	127
Troup	108
Whitfield	137
¹ Fulton County includes the homeless count for the City of Atlanta, which was 2,017. Source: U.S. Department of Housing and Urban Development data and DCA documents	

Appendix D: Federal Agencies Administering Homeless Programs

Agency	Description
U.S. Department of Housing and Urban Development (HUD)	HUD administers programs that provide emergency shelter, housing, and supportive services for individuals experiencing or at-risk of homelessness. Programs may serve all individuals experiencing homelessness or serve homeless subpopulations, such as unaccompanied youth, individuals with mental illness, individuals with HIV/AIDS, and others. HUD awards funds to states, local governments, service provider organizations, and other entities using both competitive and formula grants.
U.S. Department of Health & Human Services (HHS)	Through the Substance Abuse and Mental Health Services Administration (SAMHSA) and the Administration for Children and Families (ACF), HHS administers programs that provide emergency shelter, housing, street outreach, health care, and other services for adults and children experiencing homelessness, including those that are fleeing domestic violence. SAMHSA and ACF award program funds using both competitive and formula grants.
U.S. Department of Education (DOE)	DOE administers programs authorized by the McKinney-Vento Homeless Assistance Act, which provides technical assistance and funding to ensure homeless youth have equal access to public education. DOE awards funds to states using formula grants.
U.S. Department of Veterans Affairs (VA)	VA administers programs that provide veterans and veteran families experiencing homelessness access to transitional housing, permanent supportive housing, health care, employment services, legal aid, and other supportive services. VA competitively awards grant funds to public, nonprofit, or private entities to provide these services.
U.S. Department of Justice (DOJ)	DOJ administers programs that provide housing and supportive services for victims of sexual assault, domestic violence or assault, trafficking, or stalking that are also experiencing homelessness. DOJ awards grant funds to state, local, and non-governmental entities for these services.
U.S. Department of Labor (DOL)	DOL administers a program that helps reintegrate homeless veterans into the workforce. DOL awards funds using competitive grants.
Federal Emergency Management Agency (FEMA)	FEMA administers a program that awards funds to local service organizations for the provision of emergency shelter, food, or other services for individuals experiencing or at risk of hunger/homelessness.
Source: Agency documents	

Appendix E: Catalog of Federal Domestic Assistance (CFDA) Award Programs Included in this Audit

Program	Purpose & Target Population	Award Information
<p>Emergency Solutions Grant (ESG)</p> <p>CFDA: 14.231</p>	<p>ESG provides emergency assistance for individuals and families who are experiencing or at risk of homelessness to help them quickly regain stability in permanent housing. Specifically, ESG may fund emergency shelter, street outreach, homelessness prevention, rapid re-housing, or data collection projects.</p> <p>The Coronavirus Aid, Relief, and Economic Security (CARES) Act included additional ESG funds to address COVID-19 among individuals and families experiencing homelessness. These funds are referred to as ESG-CV.</p>	<p>The U.S. Department of Housing Urban Development (HUD) awards ESG by formula to eligible entitlement areas, which are states, territories, metropolitan cities, and urban counties. In Georgia, the 10 ESG entitlement areas are: Atlanta, Augusta-Richmond County, Clayton County, Cobb County, DeKalb County, Fulton County, Gwinnett County, Macon-Bibb County, Savannah/Chatham County, and the DCA entitlement area, which covers all areas of the state not included in one of the other nine areas. ESG funds are generally sub-granted to project sponsors, which provide the 100% match required by HUD. The match may be cash or in-kind contributions.</p>
<p>Supportive Housing Program (SHP)</p> <p>CFDA: 14.235</p>	<p>SHP, which was merged into the Continuum of Care program in 2009,¹ promoted the development of supportive housing and services to enable homeless individuals to live as independently as possible.</p>	<p>HUD awarded funds to organizations for new construction, acquisition/rehabilitation, leasing, supportive services, operating costs, administrative costs, and Homeless Management Information System (HMIS) administration. Recipients were required to provide at least 25% of total SHP operating costs. SHP funding used for acquisition, rehabilitation, and new construction required a 100% match.</p>
<p>Shelter Plus Care (SPC)</p> <p>CFDA: 14.238</p>	<p>SPC, which was merged into the Continuum of Care program in 2009,¹ provided rental assistance in tandem with supportive services for homeless individuals with disabilities and their families.</p>	<p>States, local governments, and public housing agencies were eligible to apply for SPC funds from HUD. SPC rental assistance grant recipients were required to provide supportive services at least equivalent to the value of rental assistance provided by HUD. The supportive services may have been newly created or already in operation, and may be provided or funded by other federal, state, local, or private programs.</p>
<p>Housing Opportunities for Persons with AIDS (HOPWA)</p> <p>CFDA: 14.241</p>	<p>HOPWA provides housing and supportive services to individuals living with HIV/AIDS who are low-income or who do not have access to safe and stable housing.</p> <p>The CARES Act provided additional HOPWA funds to respond to the needs of HOPWA participants during the COVID-19 pandemic. These funds are referred to as HOPWA-CV.</p>	<p>HUD awards 90% of HOPWA funding by formula grants to states and eligible metropolitan cities. The other 10% of HOPWA funds go toward competitive grants, which states, local governments, and nonprofits may apply for. In Georgia, HOPWA funds are awarded by formula to Atlanta, Augusta-Richmond County, and DCA, each of whom generally sub-awards funds to HOPWA project sponsors. HOPWA does not have a match requirement.</p>

¹ The 2009 Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act consolidated SHP, SPC, and the Section 8 Moderate Rehabilitation Program into the new Continuum of Care (CoC) program. However, SHP and SPC are still used; in Georgia, records show that the Department of Community Affairs uses SHP to support HMIS administration and SPC to support the Georgia Housing & Finance Authority Permanent Supportive Housing Program.

Program	Purpose & Target Population	Award Information
National Homeless Data Analysis Project (NHDAP) CFDA: 14.261	NHDAP-funded activities assist Continuums of Care (CoCs) through technical assistance, capacity building, and other supportive services for the implementation of and usage of Homeless Management Information Systems. In providing this support, these activities improve homelessness response data collection, analysis, and reporting.	States, local governments, nonprofits, for-profits, and other organizations are eligible to apply for cooperative agreement project funding. There is no match requirement.
Continuum of Care (CoC) CFDA: 14.267	The CoC program is designed to assist sheltered and unsheltered individuals experiencing homelessness by providing the housing and/or services needed to help them move into transitional and permanent housing, with the goal of long-term stability. By requiring service providers within the CoC to coordinate, the program promotes communitywide commitment to ending homelessness. CoC funds also support the implementation of HMIS within the CoC.	HUD awards CoC funds through an annual competitive process. Through the designated CoC lead agency, or collaborative applicant, CoCs submit a consolidated application to HUD for funding which includes a priority list of projects. Georgia has nine CoCs, including the Balance of State CoC managed by DCA that covers 152 of Georgia's 159 counties. Recipients or subrecipients of all CoC grants except those used for leasing must provide a 25% match, which may be cash or in-kind.
Youth Homelessness Demonstration Program (YHDP) CFDA: 14.276	YHDP supports communities in demonstrating a comprehensive approach to serving homeless youth up to age 24. Specifically, it provides grant funding for three areas: YHDP, Youth Homeless System Improvement, and Technical Assistance. System Improvement grants support communities in implementing a response system for youth homelessness, while Technical Assistance grants support organizations that assist with data collection and reporting for YHDP service providers. The program was initially authorized in 2019 with the primary objective of preventing and ending youth homelessness.	Organizations that serve unaccompanied youth and youth with children experiencing homelessness are eligible to apply for YHDP project grants or direct payments. HUD competitively awards funds based on set rating factors. YHDP recipients must provide a 25% match unless 1) they can identify multiple non-YHDP resources in their communities that assist homeless youth, or 2) they do not have other currently active CoC or YHDP grants.
Family Unification Program (FUP) CFDA: 14.880	FUP, which is a sub-program of HUD's Housing Choice Voucher program (HCV), provides housing vouchers for families at risk of being separated due to lack of housing and for youth exiting foster care. Family and youth eligibility is determined based on HCV income requirements. To receive an FUP voucher, the family or youth must be referred to their area's Public Housing Authority (PHA) by their area's Public Child Welfare Agency. After obtaining a voucher, the PHA makes housing assistance payments to the landlord on behalf of the FUP participant(s).	HUD awards FUP funds to PHAs that have an existing Annual Contributions Contract with HUD for Housing Choice Vouchers. The program does not have a match requirement.

Program	Purpose & Target Population	Award Information
Transitional Housing for Victims of Domestic or Dating Violence, Stalking, or Sexual Assault ("Transitional Housing") CFDA: 16.736	The Transitional Housing program provides transitional housing assistance and supportive services for adults and children who are homeless or in need of emergency housing due to domestic violence, sexual assault, or stalking. Assistance may include rental or utility payment assistance; supportive services may include transportation, counseling, childcare, case management, or other services. Program beneficiaries must voluntarily elect to receive services.	The U.S. Department of Justice (DOJ) awards Transitional Housing grants to states, local governments, tribal organizations, domestic violence and sexual assault coalitions, nonprofits, and other nongovernmental organizations. The program does not have a match requirement.
Homeless Veterans' Reintegration Program (HVRP) CFDA: 17.805	HVRP provides services to help veterans experiencing or at risk of homelessness obtain employment and helps stimulate the development of effective service delivery systems to address the problems they face.	The U.S. Department of Labor (DOL) awards HVRP funds to states, local governments, nonprofits, for-profits, and state and local Workforce Development Boards (WDBs) for eligible projects. The program does not have a match requirement.
Veteran Affairs Homeless Providers Grant and Per Diem Program (GPD) CFDA: 64.024	GPD supports organizations that provide homeless veterans with transitional housing alongside wraparound supportive services. These services are intended to assist participants with the transition to permanent housing.	The Department of Veteran Affairs (VA) competitively awards funding to eligible nonprofit applicants for projects. GPD does not have a match requirement. The program received additional CARES Act funds to allow per diem rates to be raised during the pandemic.
Veteran Affairs Supportive Services for Veteran Families Program (SSVF) CFDA: 64.033	SSVF provides supportive service grants to organizations that support very low-income veteran families that are either homeless, residing in permanent supportive housing, or are exiting permanent supportive housing. Grantees provide outreach, case management, veteran and other public benefit linkages, and in some instances, temporary financial assistance for certain costs.	VA competitively awards funding to eligible nonprofit applicants for projects. The program does not have a match requirement. SSVF received additional funds from the CARES Act and the American Rescue Plan Act (ARPA).
Education for Homeless Children and Youth (EHCY) CFDA: 84.196	EHCY provides funding to local educational agencies (LEAs) to address the problems children and youth experiencing homelessness face in enrolling, attending, and succeeding in school. LEAs may use the funds for a variety of services, including supplemental instruction programs, transportation, school supplies, referrals to assistance, course credit recovery, education for teachers and staff, programs for students affected by domestic violence, or others.	The U.S. Department of Education (DOE) awards EHCY grants by formula to state educational agencies. States then competitively sub-award no less than 75% of EHCY funds to LEAs; sub-awards are generally awarded to LEAs with large numbers of students experiencing homelessness and are based on need and quality of sub-award application. The program does not have a match requirement.

Program	Purpose & Target Population	Award Information
Projects for Assistance in Transition from Homelessness (PATH) CFDA: 93.150	PATH supports the delivery of outreach services to individuals with serious mental illness and/or substance abuse disorders who are experiencing or at risk of homelessness. PATH teams connect with individuals at the street level to help facilitate access to housing, mental health treatment, and other supportive services.	The Substance Abuse and Mental Health Services Administration (SAMHSA) awards PATH funds to states annually by formula. States then solicit proposals for PATH team operation and competitively award funds to local public or nonprofit organizations, which are known as PATH providers. SAMHSA requires that states contribute \$1 for every \$3 in federal PATH funds awarded.
Transitional Living for Homeless Youth ("Transitional Living Program and Maternity Group Homes," or TLP and MGH) CFDA: 93.550	The TLP and MGH program supports organizations that help runaway and homeless youth—including pregnant runaway and homeless youth—between the ages of 16 and 22. Through housing and supportive services, TLP and MGH help beneficiaries establish well-being and sustainable living for themselves, and, if applicable, their dependent children.	The Administration for Children and Families (ACF), a division of HHS, awards funds for TLP and MGH projects to eligible nonprofits that are not part of the juvenile justice system. Recipients must provide at least a 10% match of TLP and MGH funds, which can be met through cash or in-kind contributions. In recent years, additional TLP and MGH funds were made available through federal COVID relief programs.
Education and Prevention Grants to Reduce Sexual Abuse of Runaway, Homeless, and Street Youth ("Street Outreach Program," or SOP) CFDA: 93.557	SOP funds nonprofit youth street outreach and street services for runaway and homeless youth who are victims of or at risk of sexual abuse, sexual exploitation, prostitution, or trafficking and are 21 years of age or younger.	ACF awards SOP funds to eligible nonprofits that are not part of the juvenile justice system. Recipients must provide at least a 10% match of SOP funds, which can be met through cash or in-kind contributions. In recent years, additional SOP funds were made available through federal COVID relief programs.
Basic Center Program (BCP) CFDA: 93.623	BCP supports community organizations that address the immediate needs of runaway and homeless youth outside of law enforcement, child welfare, mental health, and juvenile justice systems. BCP also funds the National Communication System for Runaway and Homeless Youth and the Runaway Homeless Youth Training and Technical Assistance Center.	ACF awards funds to eligible nonprofits that are not part of the juvenile justice system. Recipients must provide at least a 10% match of BCP funds, which can be met through cash or in-kind contributions. In recent years, additional BCP funds were made available through federal COVID relief programs.
Family Violence Prevention and Services/Domestic Violence Shelter and Supportive Services (FVPS) CFDA: 93.671	FVPS supports domestic violence programs that provide immediate shelter and supportive services. Funds may also be used for prevention, awareness, and specialized services.	ACF awards FVPS funds annually to states and tribal organizations based on a formula. State and tribes in turn award funds to service organizations, which provide at least \$1 in match for every \$5 in FVPS funds. In Georgia, the Criminal Justice Coordinating Council (CJCC) administers FVPS; CJCC provides service organizations with the funds to meet the match requirement through the state's Family Violence program, which is state funded. States received additional FVPS funds from the CARES Act and ARPA in recent years.

Program	Purpose & Target Population	Award Information
<p>John H. Chafee Foster Care Program for Successful Transition to Adulthood ("Chafee Program")</p> <p>CFDA: 93.674</p>	<p>The Chafee Program supports programs for older youth in foster care or former foster care recipients between 18 and 21 years old.</p>	<p>ACF awards Chafee Program funds annually to states and tribal organizations based on formula. In Georgia, the GA RYSE Program administered by the Department of Human Services (DHS) serves as the state-level Chafee Program office to support these youth. DHS also sub-awards some Chafee funding to various organizations, including sub-awards to Departments of Family and Children Services (DFCS) across the state. The program requires that states pay for least 20% of total program costs as match.</p>
<p>Un-accompanied Alien Children Program (UC)</p> <p>CFDA: 93.676</p>	<p>UC provides funds for the care and placement of unaccompanied minors who are in the custody of U.S. Homeland Security, Border Patrol, or other federal law enforcement agencies.</p>	<p>ACF awards UC funds to states, local governments, nonprofits, for-profits, and other organizations for eligible projects. The program does not have a match requirement.</p>

Source: Agency documents and SAM.gov webpages

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