

The Road Home Response to  
The Limited Review of Three Facilities Operated by The Road Home  
By the Office of the Legislative Auditor General for the State of Utah  
Report Number ILR 2018-A  
May 2018

The Road Home (TRH) appreciates the Legislative Auditor General and his team for their attention to the facilities operated by our agency and the insights and recommendations that they have provided.

In this report our agency will address the specific recommendations that have been provided by the Legislative Auditor General. The recommendations are as follows:

1. *The Legislative Auditor General recommends that the Board of Trustees for The Road Home and the Board of Trustees for Shelter the Homeless consider what standards of conduct will be required of those residing in their facilities and how to enforce those standards.*

The Road Home management team will review all standards of conduct documents with members of the Board of Trustees in May 2018 and with Shelter the Homeless (STH) in a timeframe that meets their schedule. TRH and STH will work together to confirm these standards and the processes we utilize to enforce them.

2. *The Legislative Auditor General recommends that the Board of Trustees of The Road Home and its management adopt written policies and procedures for the intake process and ensure all staff implement them.*

The Road Home has undertaken a commitment to provide Trauma-Informed Care (TIC). As part of this transformation, management has initiated a process that involves reviewing all policies, procedures, and forms that we use to manage the programs and activities of our organization. This process will include The Road Home Board and its management. We refer to a number of these procedures in our response and would be happy to provide any to Legislators upon request.

We acknowledge that there exists a range of variation in our check-in procedures. Our management team has initiated a quality assurance review process that we expect will greatly reduce the range of variation. It includes, but is not limited to, training all new shelter staff, retraining existing staff, and expanding the oversight responsibilities to include a broader level of managers. We have equipped a number of teammates with camera access to increase the frequency that our management team oversees the check-in process. While shelter supervisors remain responsible for their teams' performance, they will benefit from extra personnel to aid with the oversight through the use of camera access to the lobbies where check-in occurs. We are ensuring that all procedures are up to date and that we have appropriate quality oversight processes in place to implement these procedures consistently.

3. *Legislative Auditor General recommends the Board of Trustees of The Road Home and its management team define the expectations that they have of residents and staff, adopt clear written policies, and ensure all policies are followed by staff. Policies might include the following:*
  - a. *Standards of cleanliness at Palmer Court Apartments*
  - b. *Conditions that must be met to qualify for a companion animal and the number of companion animals allowed*
  - c. *Measures to be taken when residents are found to be using drugs, selling drugs, or otherwise abusing controlled substances*
  - d. *The response when residents at Palmer Court fail to pay their rent*

The Road Home management and Board of Trustees are in the process of reviewing policies and procedures specific to expectations of residents and staff, including policies addressing a through d above as follows:

- a. We conduct regular inspections of apartments and work with those who struggle with basic care through case management and an outside cleaning company when needed.
- b. We have a Service/Companion Animal policy that is in compliance with Fair Housing that we review with each tenant requesting an animal. The tenant then signs an Assistance Animal Agreement that outlines their responsibility in care of the animal.
- c. Consistent with Permanent Supportive Housing evidence-based practices, Palmer Court screens for people with disabilities and the highest level of vulnerability, including substance use disorders. Drug dealing is reported to law enforcement and will lead to eviction.
- d. Payment of rent is a key component of housing. As part of our client-centered services, we take into account personal circumstances when a tenant is behind in rent, including health issues and loss of income. We have instituted a Rent Payment Process with tenants who are behind in rent that empowers them to pay back rent in a manageable timeframe.

The Palmer Court budget, which is approved by The Road Home Board of Trustees, includes a 5% rent loss expense. We have had independent financial audits of Palmer Court since its inception, and we are confident that they have not contained any significant findings about how we have managed our rent loss. We concur with the auditors that it is important to manage expenses properly. Like any rental property, a responsible budgeting process will take rent loss into account. In the case of people in permanent supportive housing, our team would suggest that evicting a chronically homeless individual back onto the streets can, in some cases, lead to increased costs to the taxpayer or the community resulting from an increase in the frequency of emergency room visits, episodes of incarceration, and requests for services from the homeless emergency provider network. There is evidence supporting this assertion<sup>1</sup>. With that in mind, the team expects tenants to pay their rent in a timely fashion. The Road Home makes reasonable accommodation for those for whom making a monthly rent payment has become temporarily insurmountable.

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<sup>1</sup> Culhane, Dennis P., et al., "Public Service Reductions Associated with Placement of Homeless Persons with Severe Mental Illness in Supportive Housing," in *Housing Policy Debate*, Vol. 13, Issue 1, Fannie Mae Foundation 2002, p. 107-63.

In the next part of our response, we are providing some contextual information, including background and evidence-based practices, that inform our service delivery model.

## **Evidence-Based and Best Practice Strategies Utilized by The Road Home**

### **LOW-BARRIER SHELTER**

Immediate and low-barrier access to shelter is one of the key elements of an effective emergency shelter, according to the National Alliance to End Homelessness.<sup>2</sup> Low-barrier access means that we screen people in, not out. It means that we attempt to eliminate all barriers that would prevent someone from entering shelter. It does not include prerequisites of sobriety or agreement to participate in services or background checks.

Low-barrier shelter includes basic expectations such as treating everyone and the building with respect and being a good neighbor. A low-barrier facility can also ban weapons and substance use in the building.

When people do not live up to the expectations, we ask them to leave and require them to meet with staff before allowing them to return. We work closely with law enforcement regarding issues of violence, dealing, and predatory behavior. We work with our partners to determine appropriate law enforcement action regarding people with substance use addictions, and outline the plan in a consistent and ongoing procedure, including quality checks.

### **Housing First**

The Road Home is a Housing First Agency. The following is a description of Housing First by the Department of Housing and Urban Development's Housing First in Permanent Supportive Housing Brief.

Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.<sup>3</sup>

## **The Road Home's Role in Salt Lake County's Homeless Service System**

The Road Home operates the Salt Lake Community Shelter for single men and single women who are experiencing homelessness; it is the largest shelter in Utah serving an average of 712 (FY 18 to date) people per night. This program serves as the last resort for individuals who have no other place to stay. This includes people who are not welcomed at other services due to their personal barriers or behaviors. Many of the people who are turning to shelters are in the throes of serious crises. In the current model of homeless service delivery in our community, there are few alternatives for those turning to shelter. In some cases, a person may be eligible for emergency medical care at our local hospitals. In other cases, a person may be eligible for an emergency psychological evaluation. Others may exhibit behaviors so disruptive that it is necessary for local authorities to intervene. As a result, many men and women turn to the downtown emergency

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<sup>2</sup> <https://endhomelessness.org/resource/emergency-shelter>.

<sup>3</sup> <https://www.hudexchange.info/resource/3892/housing-first-in-permanent-supportive-housing-brief>.

shelter operated by The Road Home. **Our agency would concur with the auditors' citation of the HUD report indicating that 22 percent of people turning to shelters in Utah are struggling with chronic addiction and approximately 30% are experiencing severe mental illness.**

The Salt Lake Community Shelter is approximately 80,000 square feet. It has the capacity to provide shelter to 1,062 individuals; however, in order to reach capacity, all office space currently in use would have to be converted to shelter space. In the past, it has not been uncommon for our downtown emergency shelter to house 900 to 950 occupants.

As the state's largest shelter, this facility is over three and a half times larger than any other emergency shelter in the state. Of the entirety of people turning to emergency shelter in Utah, as many as half turn to the downtown shelters operated by The Road Home on any given night. The demand for emergency shelter has grown steadily over the past two decades.

Many factors affect the number and types of needs of individuals who seek shelter. The lack of affordable housing, increase in rents, and incredibly low vacancy rates for deeply affordable housing along with lack of income growth have significantly contributed to the increase in the number of people we have needed to shelter.

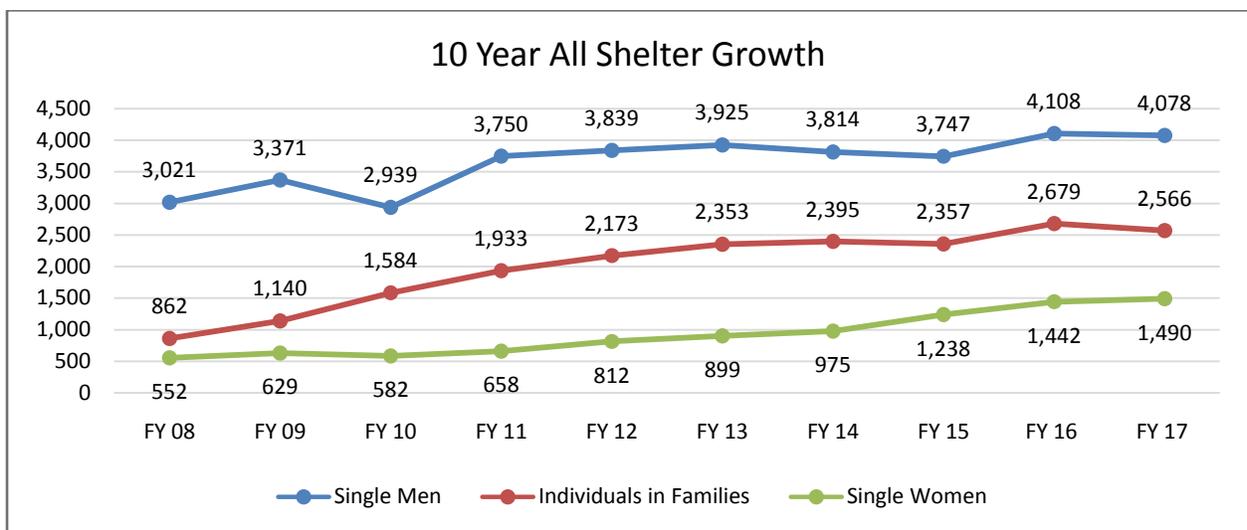
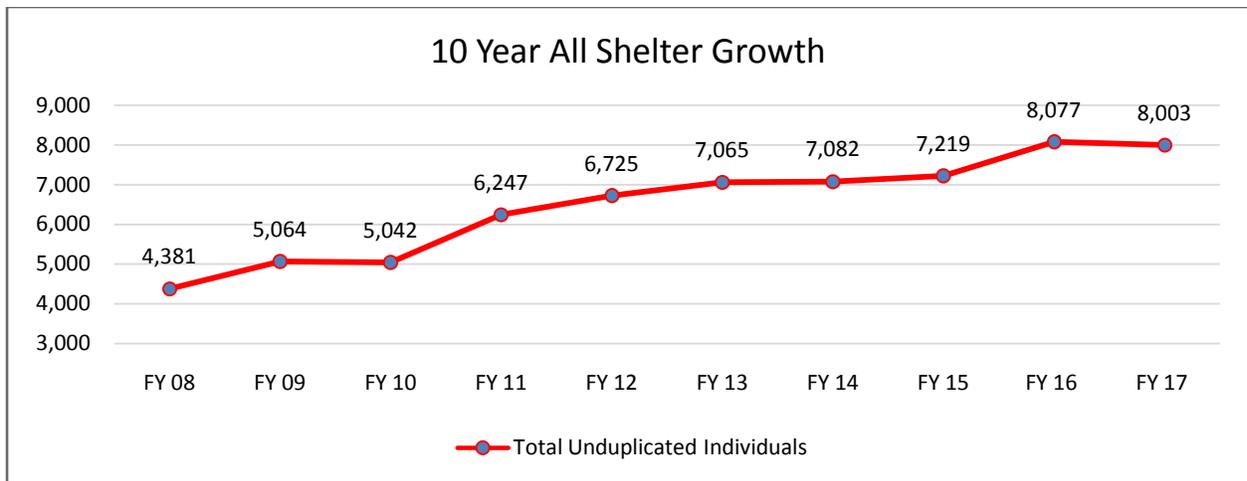
The state and county's Justice Reinvestment Initiative identified that jails are not the best place for individuals who suffer from addiction disorders. As a result, officials reduced the number of individuals incarcerated for minor substance abuse crimes. Our agency witnessed a correlating increase in the number of individuals using substances on the streets. The lack of treatment and housing options for people with these disorders led to a tremendous growth in the number of people with addictions who had nowhere else to go and sought help at the Salt Lake Community Shelter.

The national heroin epidemic has hit our community hard, and many people who have suffered significant trauma and abuse have turned to heroin. We have seen a spike in the use of heroin among people experiencing homelessness and those seeking shelter.

The Road Home is an active participant in the Collective Impact and shelter planning process. We support the plan for new, smaller and population-specific facilities. The limit of 200 or 300 people in each facility will allow a much more personalized and client-focused housing and service program, including behavioral health support, than we are funded to provide now.

With the proper level of resources and staffing ratio to the number of people staying in a shelter, we will be better equipped to achieve our community's shared outcomes as identified by the Community Impact process.

The following two graphics illustrate the growing number of people who have turned to the emergency shelters operated by The Road Home over the past ten years. The first graphic includes the total number of people annually. The second graphic breaks it down by single women, single men, and individuals in families.



**Public Safety Concerns at the Salt Lake Community Shelter**

Our team concurs that public order is a priority.

Only in certain specific cases will an individual be asked to leave shelter. These cases usually include disruptive behavior, which includes threatening or abusive behavior, theft, smoking, and/or drug use in the building. Our team works closely with our security team to address these issues. It is not uncommon for people suffering with addiction to attempt to bring contraband into the shelter and, in some cases, succeed in utilizing drugs within the facility. Our shelter serves drug addicts, alcoholics, and people with mental disorders. We work to minimize negative incidents, but a certain amount is unavoidable as long as we provide shelter to this population.

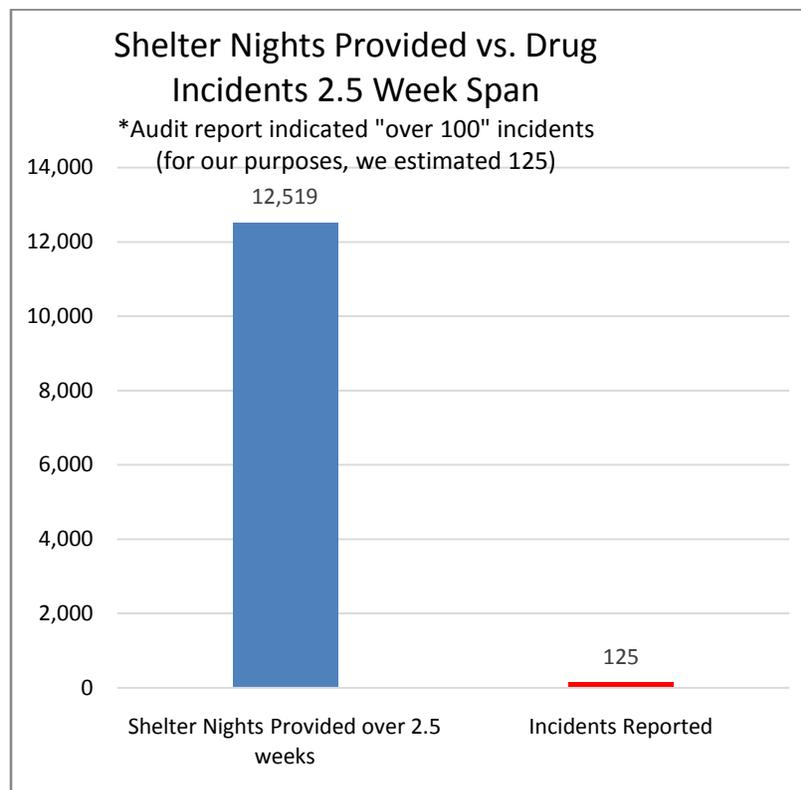
Operation Rio Grande has significantly improved the area along the Rio Grande corridor, including Rio Grande Street, 500 West, and the Pioneer Park area. The increased presence of law enforcement officers has served as an effective deterrent to the rampant drug dealing that was incredibly active for some years prior to the implementation of this operation. The presence of Utah state troopers, coupled with an increased presence of Salt Lake City police, has been instrumental in dramatically

improving the quality of life in the neighborhood. According to a report issued by the state of Utah, there was a 46% decrease in the number of offenses in the area over a year, from February 2017 to February 2018.<sup>4</sup>

Our management team at The Road Home has worked closely with the State of Utah Department of Public Safety (DPS) in an effort to interdict drug use in the shelter. Our management team has identified the propensity for some individuals to attempt to seek refuge from law enforcement by moving off the streets and into public places in order to support their addiction. Our team has invited members of the DPS into our facility at any time, at any hour. DPS personnel have supplemented our efforts to provide security. Additionally, DPS has provided the use of a trained canine to support our efforts to interdict drugs entering the facility. **The partnership with the team from the Utah Department of Public Safety is what led to the officers making the arrest of an individual who had in his possession contraband, including a loaded weapon.**

Please bear in mind that the vast majority of services that we provide are trouble free.

The following graphic compares the total number of shelter nights provided during an average 2.5-week period to the number of incidents reported by the auditor. The number of drug-related incidents represents less than 1 percent of the total number of bed nights our agency provides in an average 2.5-week period.



We appreciate the auditors providing us with their perspective by making rounds at various hours. For our team, it serves as an extra set of eyes helping to identify problems. This is an important dimension of what our team attempts to achieve consistently through the continuous 24/7

<sup>4</sup> <https://operationriogrande.utah.gov>.

operation of the state's most-used emergency shelter. The auditors' observations illustrate the challenge that our team encounters when doing rounds, namely, evidence of drug use without witnessing it firsthand. **By improving the consistency of our current check-in procedure, we believe that we can improve the rate at which we deter individuals from attempting to bring certain contraband into the shelter.**

Our team, in partnership with private security officers, conducts rounds throughout our building approximately 366 times throughout one week. This includes all common areas, each of the dormitories, the lobbies, and the restrooms. The dorms and the restrooms require particular focus from our team when rounding.

### **Facility Rounding Every 30 Minutes Includes**

- Main Desk
  - Dorms, Restrooms, Common Areas, Park Areas
- Women's Dorms
  - Dorms, Restrooms, Common Areas, Laundry
- Men's Dorms
  - Dorms, Restrooms, Common Areas, Park Areas, Laundry
- Administrative Areas
- Stairwells/Elevators
- Locked Doors Between Dorms
- Warehouse and Donation Areas
- Grounds and Entrances Surrounding Facility

**Rounding Completion Rate per Week: ~92%**

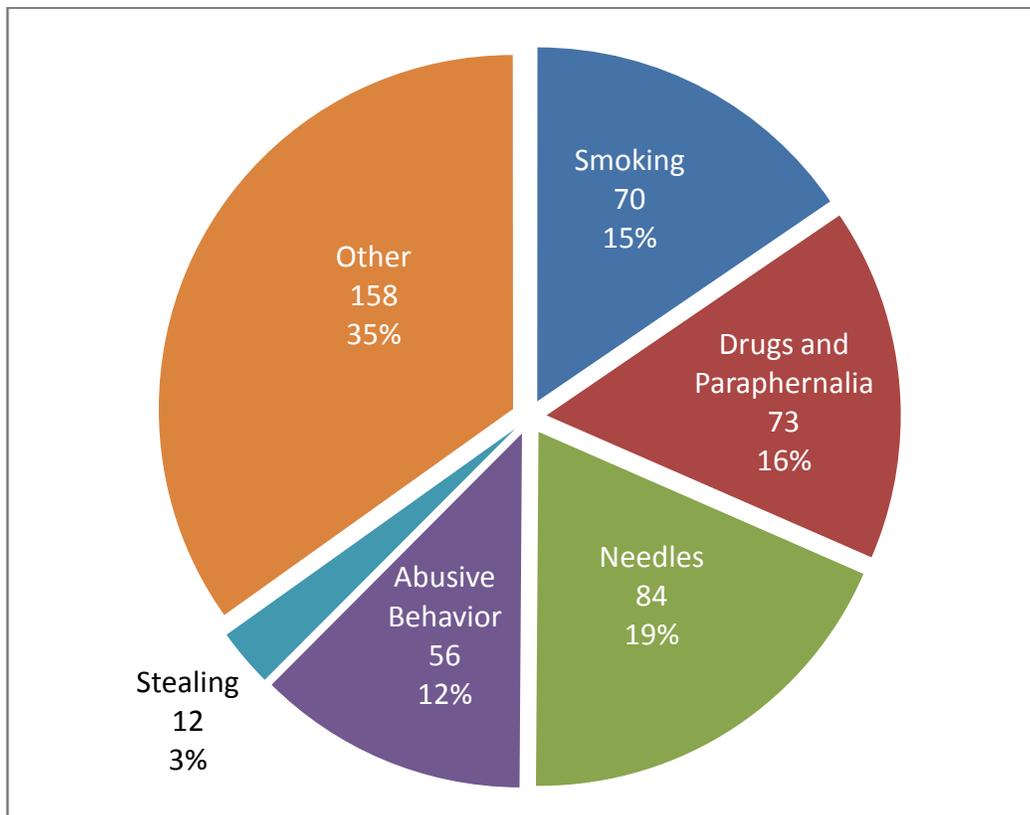
### **IMPROVEMENTS TO SECURITY SYSTEMS**

With the help provided through the auditors, our team was able to identify some holes in the execution of our rounds. Here are some that were identified by the auditors and what we have done subsequent to their communication to us:

- The auditors identified a door alarm that was in need of repair. Our team reached out to the vendor and had the door alarm repaired promptly (receipt included in this report).
- Our team has developed a more comprehensive rounding checklist, which includes team members signing and initialing the checklist of specific procedures to be included in rounds.

The following pie chart is a breakdown of the 453 individuals who were temporarily expelled from our shelter and the types of behaviors that were the cause of their expulsion.

**BAR TYPES AND RATES (JANUARY THROUGH MARCH 2018)**



### **Midvale Family Resource Center**

Families who are experiencing homelessness have many complex needs. We have built a comprehensive Resource Center program to meet those needs. Adults in families have a very high rate of previous violence, abuse, and trauma in their lives. Many turn to illegal substances as an escape. The Midvale Resource Center welcomes all families who would otherwise be sleeping outside with their children. Our Diversion partnership with Utah Community Action is effective in ensuring that families who have any other options do not have to resort to a shelter.

Parents with addiction disorders love—and many can still care for—their children. When we observe neglect or abuse, we immediately notify the Division of Child and Family Services and engage with the family to provide support and connection to community resources.

We have a strong partnership with the Midvale Unified Police Department which has officers assigned to the Resource Center. This partnership helps us to ensure safety by identifying and addressing criminal issues quickly. We support the use of the police drug canine as a tool to prevent and identify drug use in the building.

## **Palmer Court**

Palmer Court is a 201-apartment Permanent Supportive Housing (PSH) facility with robust onsite services. The building common areas are covered by security cameras that are observed from two entrance desks staffed 24/7. We check the cameras and camera placement and fix all issues, usually within 24 hours. The facility is a converted hotel with many building entrances that are secured in various ways. Guests are required to sign in and out, and tenants or management can ban certain problem guests. People are banned for violence, predatory behavior, violating house rules, and disturbing neighbors. We are reviewing this security, along with input from tenants, in order to make any changes that would improve safety.

As a PSH program, we screen in, not out. Eligibility for Palmer Court requires documentation of chronic homelessness, a disabling condition, and an assessment for level of service need. Of those who are experiencing chronic homelessness, we select people with the greatest service needs that include serious mental health and substance use disorders. Our goal is to surround people with services and support that will lead to stable housing.

In addition to 24/7 staff, we have private security onsite during intermittent hours each week. We work with law enforcement regularly. Drug dealing is reported to law enforcement and has led to eviction. We notify Child Protective Services every time we become aware of an activity that may endanger a child.

Our goal is to work with people to help motivate change and keep people housed. Sometimes this does not work, and we need to evict in order to maintain a safe and supportive environment. In 2017, we had ten evictions, four of which were drug related, two were violence related, and four were apartment maintenance and neighbor disturbance related.

Our program policies are consistent with a Housing First approach, which does not consider alcohol or drug use in and of itself to be lease violations, unless such use results in disturbances to neighbors or is associated with certain illegal activity (e.g., selling illegal substances). We train our staff in Motivational Interviewing, which is a best practice for Substance Use treatment. Change is internally motivated and best facilitated within relationships of trust and connection.

We conduct regular inspections of apartments and work with those who struggle with basic care through case management and an outside cleaning company when needed. We follow laws regarding tenant rights, and staff must be invited in or give 24-hour notice of entry.

We have fixed all of the Health Department repairs as of April 27, 2018, with the possible exception of one tub resurfacing in process. We complete property inspections on every unit four times a year. If a unit fails, we go back and inspect it 30 days later. In the meantime, we work with the tenant to address issues. Given the population we are serving, we have robust daily maintenance needs and an electronic system to track tenant maintenance requests, the majority of which are completed within 24 hours. We have Pest Control onsite once a week. All units that are reported to have pests by staff or residents are treated that week. In all, units are treated once a year regardless of any reports. Depending on the needs, each unit will have a specific follow-up treatment plan.

We have a Service/Companion Animal policy that is in compliance with Fair Housing that we review with each tenant requesting an animal. The tenant then signs an Assistance Animal Agreement that outlines their responsibility in care of the animal. When the tenant is unable to care

for the animal, we work with the individual and have animal control remove the animal if we cannot improve the situation. Sometimes families have more than one animal if they have more than one person in the unit with a disability who benefits from a companion. The use of animals in psychiatric care and recovery has a long history, particularly for individuals who have experienced trauma. Studies demonstrate that animals reduce depression, anxiety, and symptoms of Post-Traumatic Stress Disorder. Pets have also proven to improve quality of life, such as better sleep, reduction in problem behaviors in children, and improved social outcomes. We recognize the benefits of animal companionship and work diligently with those who are struggling to care for their pets.

Payment of rent is a key component of housing. Consistent with Permanent Supportive Housing practices, we have policies that give tenants some flexibility and recourse in their rent payment. As part of our client-centered services, we take into account personal circumstances when a tenant is behind in rent, including health issues and loss of income. When we accept a person into Palmer Court, we invest significant resources and commitment to help them end their homelessness. It makes sense to work with them when they encounter crises that result in unpaid rent rather than move to immediate eviction. We have instituted a Rent Payment Process with tenants who are behind in rent that empowers them to pay back rent in a manageable timeframe. Since January, we have met with 37 tenants to establish a Rent Plan. Of those, 19 have successfully completed their first quarter of payments. We continue to work with the remainder, many of whom have shown smaller signs of improvement. People involved in this plan have stated that it is empowering and helps relieve some guilt they were feeling for being behind on their rent.

## **Conclusion**

We are grateful to the Legislative Auditor General and his team for their efforts to assist The Road Home in improving service delivery. We appreciate their efforts to garner greater understanding of the myriad of complexities and the sheer enormity of the problems that contribute to homelessness in our community.

Our agency understands audit processes. Every year, we have had a full independent audit of our financial records. Consistently, our management team has implemented the recommendations provided therein.

Our agency is audited by government at the federal, state, and local levels. The Road Home has participated in approximately 20 program audits annually. Each audit provides an opportunity to learn and improve, and our team takes advantage of these opportunities.

Our agency is committed to doing its part. Thanks in part to this audit process, we have already learned of areas where we can improve in the delivery of services we provide. We are committed to continuing to improve.

Making a significant impact on the people who are turning to shelters or camping in our streets, who are suffering from illnesses without the benefit of treatment, or the tens of thousands of Utahns who live in poverty and are on the brink of homelessness, will take a collaborative effort that has, in our agency's perspective, yet to reach its potential. The need to make available deeply affordable housing is a prominent example of where our community and state have an opportunity to reduce homelessness.