
Rapid Rehousing for Individuals

September 3, 2025

A Management Alert Report by the Office of the District of Columbia Auditor



September 3, 2025

Rachel Pierre
Interim Director
Department of Human Services
64 New York Avenue NE, 6th Floor
Washington, DC 20002

Management Alert: Department of Human Services is not collecting required income data for participants in its Rapid Rehousing for Individuals Program (RRH-I).

Dear Ms. Pierre:

The Office of the D.C. Auditor (ODCA) writes this Management Alert to inform you that the Department of Human Services (DHS) is not collecting income data upon entry or exit for individuals in its RRH-I. ODCA has been evaluating data provided by DHS regarding income growth of participants in the Family Rehousing Stabilization Program (FRSP) and RRH-I. During our analysis of RRH-I, it became apparent that enough income data was missing to prevent any meaningful analysis.

Participant income collection is required by the Homeless Services Reform Act, the authorizing legislation that was passed by the D.C. Council in 2005.¹ The Act provides the definitions for individuals and families who qualify for homeless services. To qualify for services in the Continuum of Care, an individual (or family) must be a D.C. resident who is homeless or at risk of homelessness,² which is defined as having an annual income below 40% of the median family income for the Washington DC Metropolitan Area, as determined by the U.S. Department of Housing and Urban Development.³

The Human Care Agreement that DHS enters into with contracted service providers also lists five specific requirements related to income data collection.

1. Case managers will help participants collect all required documentation, including income documents, and ensure that documentation is recorded in the DHS system.⁴

1 The Homeless Services Reform Act of 2005, DC Law 16-35, effective October 22, 2005, establishes the rights and responsibilities of clients and homeless service providers and the standards by which the District of Columbia and homeless service providers must deliver services to clients. The original Act has been amended several times.

2 D.C. Code § 4-753.02(a)(1). This section also has a residency exception for certain shelters and requires compliance with additional eligibility requirements that may be established by the housing provider.

3 D.C. Code § 4-751.01(5B)(A)(i). The Act lowers the threshold to below 30% of the median family income for the Washington DC Metropolitan Area if providing a program or service to the individual or family would require the District or a provider to expend funds that are restricted by federal law or policy on the individual or family. See D.C. Code § 4-751.01(5B)(A)(iii). Additionally, that Code section includes other factors that may qualify individuals or families for programs within the Continuum of Care.

4 Human Care Agreement with Metropolitan Educational Solution, LLC section C.8.6.

2. The Provider shall help participants with the housing navigation process, including collection of necessary documents such as income verification statements and pay stubs.⁵
3. All Participants must participate in Quarterly Reassessments where their progress is tracked through a review of updated documentation such as income documents for the past 30 days.⁶
4. The Provider shall ensure that initial income and all income changes are recorded in the database monthly or as needed.⁷
5. The Provider shall determine and document participant income information into the DHS identified database at the following times—upon entrance into the program, when changes of income occur, and upon exit from the program.⁸

Upon our request, DHS provided ODCA with a de-identified report listing all participants who exited the program between October 1, 2021, and September 30, 2024. We asked DHS to include the participants' income at both entry into and exit from RRH-I. The report included records on 1,791 program participants. The report lacked all income data or partial income data for 1,519 of those participants, 799 of whom exited the program before January 1, 2023, and 720 of whom exited after January 1, 2023. Only 272 participants' records included income data both at entry and exit.

According to DHS, the 799 program participants who exited the program before January 1, 2023, lacked income information because the agency was using an OCTO-provided Quickbase application that did not contain fields to collect income information before that date. On January 1, 2023, the database fields were updated.

When asked about data missing from records compiled after January 1, 2023, DHS cited multiple reasons that collecting income data is difficult with this population. For example, some individuals did not have an intake completed because DHS was unable to connect with the clients after they were matched to a program. DHS also referenced not holding a specific exit interview with exiting participants in which income data can be collected and that clients often get terminated because they have not been compliant with program rules and refuse to share information with the program. Finally, DHS explained that providers occasionally make errors by not recording the information accurately or fail to ask for the information.

Finally, in response to questions about the missing data, RRH-I staff cited other priorities, stating:

“Certainly, we’d prefer to have the information, however, quickly housing an individual and then addressing their needs is the main focus of the program. For many clients income growth is not a primary goal while in the program as they may instead be focused on addressing their mental health concerns, substance use concerns, or their medical needs. We continue to aspire to getting consistent document verified income data for all clients (if they have income) as an additional piece of the client puzzle to determine how we most effectively support the client.”⁹

5 Human Care Agreement with Metropolitan Educational Solution, LLC section C.7.3.2.

6 Human Care Agreement with Metropolitan Educational Solution, LLC section C.8.20.1.

7 Human Care Agreement with Metropolitan Educational Solution, LLC section C.8.28.

8 Human Care Agreement Section C.8.50.

9 This quote originated in an email conversation between ODCA AIC Kelly Hunt and staff on the DHS Accountability Team. The statement made in this email conversation was emailed to ODCA on Friday, June 27, 2025.

Without collecting the required income data, DHS cannot ensure participants qualify for services or monitor their progress and the agency is out of compliance with the authorizing legislation, and its own Human Care Agreements. The goal of the program is to transition individuals out of homelessness or homeless shelters and into stable housing and to be independent of rental assistance. Without data on a participant's income, it is impossible to determine if that participant is eligible for the program or if the participant is likely to remain housed once the housing subsidy ends.

Recommendations:

1. DHS should monitor the information provided by the service providers when they enter a new household into the Quickbase system, including conducting periodic audits of HMIS data to ensure income is being entered.
2. DHS should require Providers to conduct exit interviews when participants exit the program in an attempt to collect all required documentation.

This report was drafted, reviewed, and approved in accordance with the standards outlined in ODCA's Audit Policies and Procedures.

If you have any questions about this Management Alert Report, please feel free to contact me at kathy.patterson@dc.gov or (202) 727-8982.

Thank you for your consideration. I look forward to continuing to work with you and your staff on this and other reviews with the goal of improving the District government and benefiting residents of the District.

Sincerely yours,

A handwritten signature in blue ink that reads "Kathy Patterson". The signature is written in a cursive, flowing style.

Kathleen Patterson
District of Columbia Auditor

cc: Christa Phillips, DHS
Betsy Cavendish, EOM
Matthew Frumin, Ward 3 Councilmember
Daniel Passon, Committee on Human Services Director

Agency Comments

On August 1, 2025, we sent a draft copy of this report to the Department of Human Services (DHS) for review and written comment. DHS responded on August 15, 2025. Agency comments are included in their entirety.



DC

DEPARTMENT of
HUMAN SERVICES

August 15, 2025

Kathleen Patterson, District of Columbia Auditor
Office of the District of Columbia Auditor
1331 Pennsylvania Avenue NW, Suite 800 South
Washington, DC 20004

Dear Ms. Patterson,

By this letter, I am providing written responses from the District of Columbia (“District” or “D.C.”) Department of Human Services (“DHS”) to the draft Management Alert Report: Rapid Rehousing for Individuals.

To provide context for our response, it is critical to note that while it is an important component of a client’s potential success in the Rapid Rehousing for Individuals (“RRH-I”) program, income growth is not the sole program outcome priority. Additionally, all services and program requirements are subject to clients’ willingness to participate actively in their case management and program services. DHS continues to identify and implement improvements to its RRH-I program, including evaluating the current program design and adjustments to our program outcomes.

Report Statement: Participant income collection is required by the Homeless Services Reform Act, the authorizing legislation that was passed by the D.C. Council in 2005. The Act provides the definitions for individuals and families to qualify for homeless services. To qualify for services in the Continuum of Care, an individual (or family) must be a D.C. resident who is homeless or at risk of homelessness, which is defined as having an annual income below 40% of the median family income for the Washington DC Metropolitan Area, as determined by the U.S. Department of Housing and Urban Development. (p. 2)

DHS Response: Under the Homeless Services Reform Act of 2005 (“HSRA”), as amended, a client may qualify for Continuum of Care services if they are either homeless or at risk of homelessness. See D.C. Official Code § 4-753.02(a)(1). Income information is required to determine if a person qualifies as “at risk of homelessness,” but not as “homeless.” See D.C. Official Code § 4-751.01(5A), (5B). When a client qualifies for a Continuum of Care program because they are homeless, as most RRH-I clients have in recent years, recording their income information is not a required component of the intake process.

Recommendation 1: DHS should monitor the information provided by the service providers when they are entering a new household into the Quickbase system, including conducting periodic audits of HMIS data to ensure income is being entered.

DHS Response: Quickbase is the primary system of record for RRH-I. HMIS is utilized only to record program entry and exits. However, DHS agrees to periodically sample and audit the HMIS and the Quickbase systems to confirm data entry is occurring and to confirm data quality. This will be implemented by the end of the first quarter of FY26.

Recommendation 2: DHS should require Providers to conduct exit interviews when participants exit the program in an attempt to collect all required documentation.

DHS Response: DHS will work with the D.C. Office of Contracting and Procurement (“OCP”) to modify the Human Care Agreement (“HCA”) to include a requirement for Providers to make attempts to conduct exit interviews with clients and to document these efforts. However, clients are not always willing to participate in this process for a variety of reasons and DHS and our contractors cannot force clients to participate in exit interviews.

We appreciate the opportunity to review and provide feedback on the draft report. If you have any questions about this response, please reach out to Christa Phillips, DHS Chief Accountability Officer, at 202-200-7669.

Regards,



A. D. Rachel Pierre
Acting Director, Department of Human Services

ODCA Response to Agency Comments

We appreciate the Department of Human Services's comments on the draft report and are pleased with DHS's concurrence with and agreement to implement both of our recommendations.

Specifically, we appreciate that DHS agreed to periodically audit a sample of data submitted by contracted service providers to improve the quality of the data and ensure they are in compliance with the legislation and Human Care Agreements (HCAs). We particularly appreciate that DHS agreed to implement this recommendation expediently, as soon as the first quarter of FY 2026. We also appreciate that DHS agreed to work with the Office of Contracting and Procurement to include a requirement in new HCAs requiring contracted service providers to conduct exit conferences with participants when they exit the Rapid Rehousing Program. We acknowledge DHS's point that this requirement may be difficult for some service providers to comply with given that program participants occasionally exit the program without notifying their provider or are unwilling to participate in an exit conference.

DHS and ODCA share the goal of continuously improving District of Columbia government and appreciate the valuable services that DHS programs offer to its residents. We value the partnership with DHS throughout the review and the Agency's responsiveness to our requests.

About ODCA

The mission of the Office of the District of Columbia Auditor (ODCA) is to support the Council of the District of Columbia by making sound recommendations that improve the effectiveness, efficiency, and accountability of the District government.

To fulfill our mission, we conduct performance audits, non-audit reviews, and revenue certifications. The residents of the District of Columbia are one of our primary customers and we strive to keep the residents of the District of Columbia informed on how their government is operating and how their tax money is being spent.

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