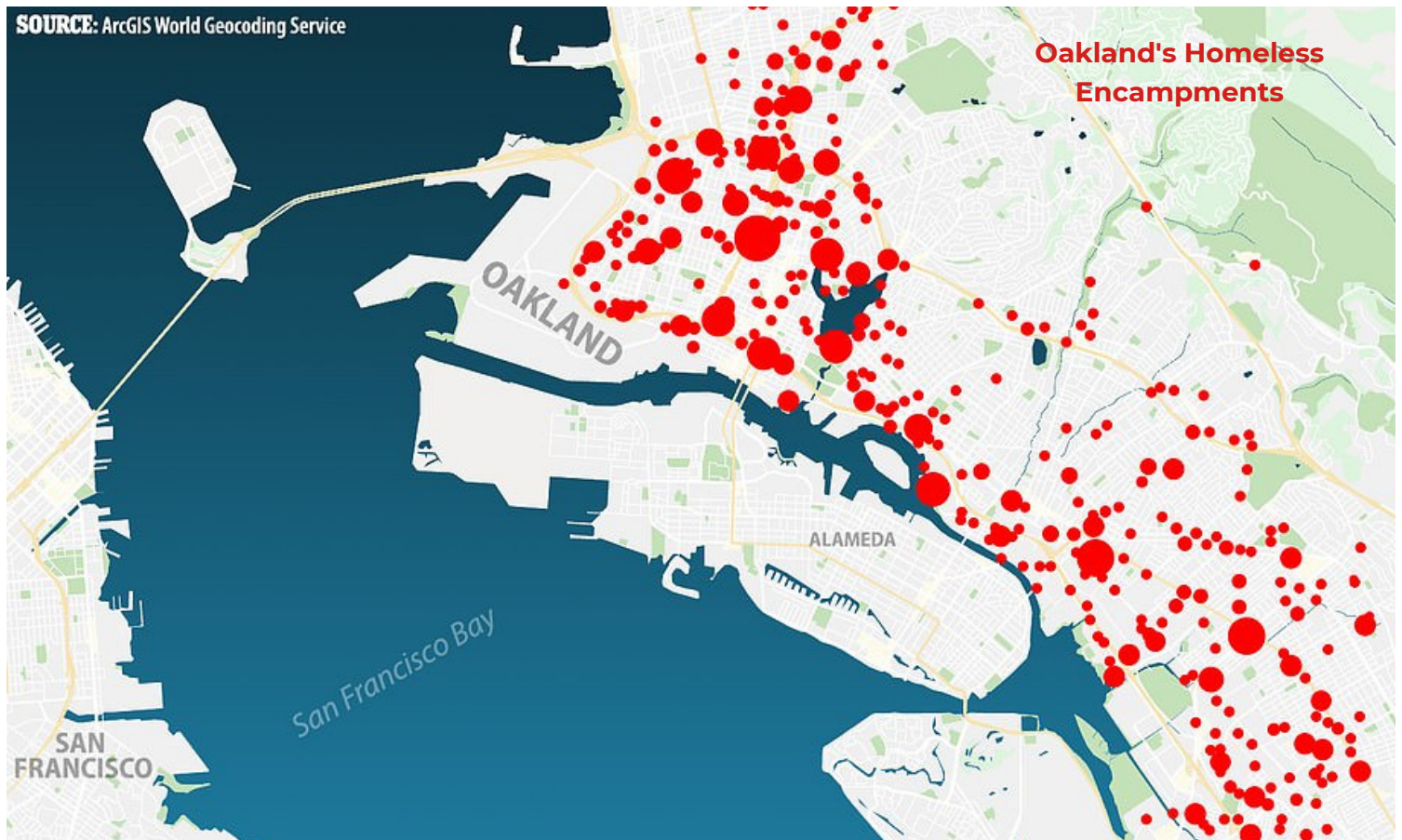


SOURCE: ArcGIS World Geocoding Service



PERFORMANCE AUDIT OF THE CITY OF OAKLAND'S HOMELESS ENCAMPMENT MANAGEMENT INTERVENTIONS & ACTIVITIES FISCAL YEARS 2018-19 AND 2019-20

CITY AUDITOR

Courtney Ruby, CPA, CFE

AUDIT TEAM

Assistant City Auditor, Mike Edmonds, CIA

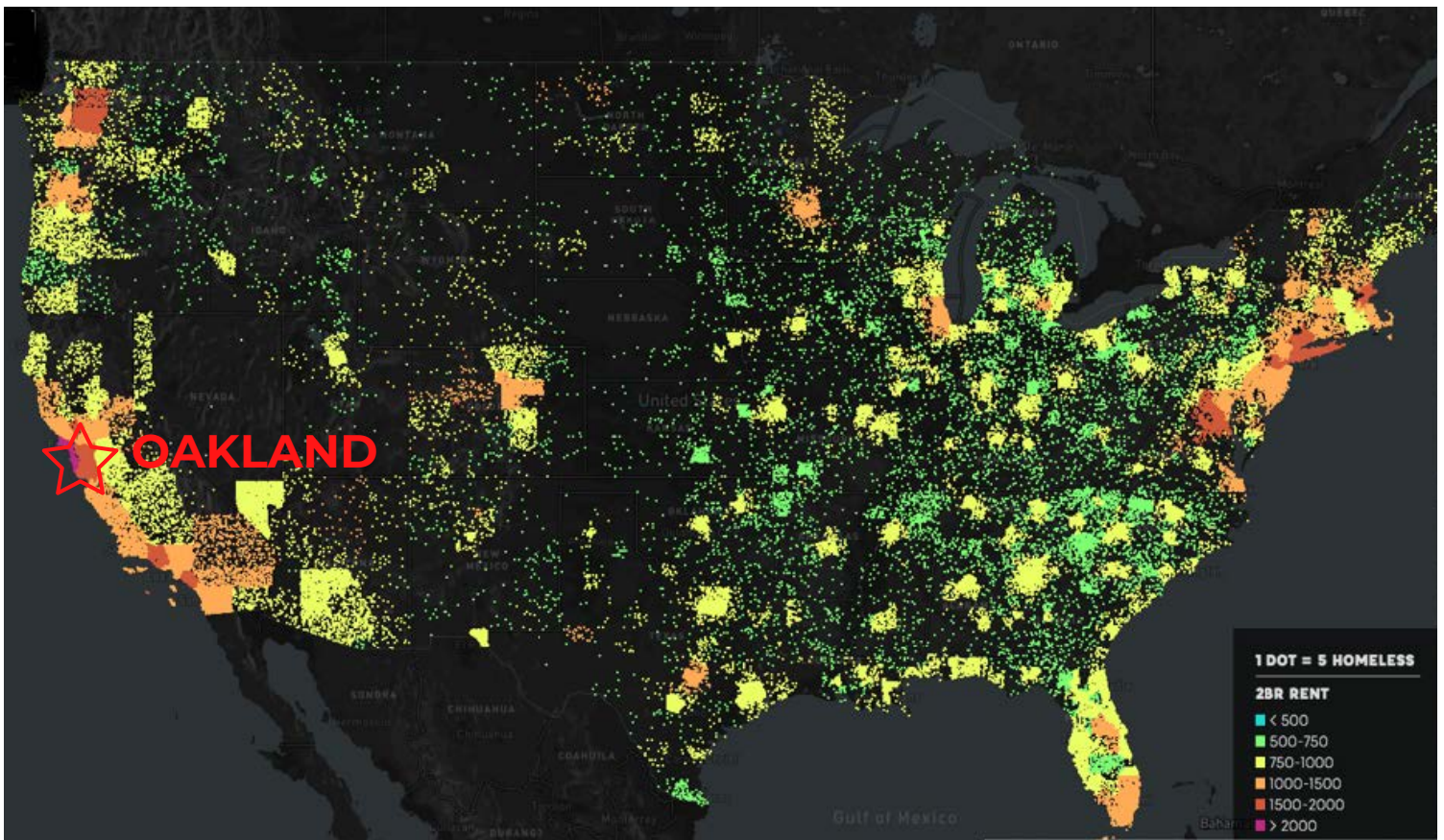
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Performance Auditor, Daniel Williams

APRIL 14, 2021



Source: Understanding Homelessness/Sasaki: <https://www.bloomberg.com/news/articles/2017-04-07/where-america-s-homeless-live>.

Acknowledgments

Homelessness is a serious problem, not just in Oakland, but across the United States. Solving the root causes of homelessness and housing affordability will require an unprecedented amount of intergovernmental, business, and nonprofit coordination and cooperation – it will require a model similar to the COVID response where we all come together with a sense of urgency, respect, commitment, and shared purpose. Therefore, I'd like to thank all those who contributed to this important audit.

Thank you to the City's Encampment Management Team and all the City departments and offices that assisted us in completing this audit.

I also want to thank Oakland's homeless advocates and members of the homeless population for meeting with us at the start of this audit. Both your lived experiences and knowledge of homelessness helped us better understand the problems our unsheltered community are facing.

I want to commend Pauline Miller, Juliet Flores Wilson, and Alexandra Marzolf, from the Goldman School of Public Policy at the University of California, Berkeley, for their outstanding work and contributions to this report.

I especially want to thank my entire team for their tireless work, dedication, and energy they put into this audit. Your expertise and professionalism shine through in this report.

Last, but certainly not least, I want to thank my Assistant City Auditor, Mike Edmonds, for his partnership and auditing expertise. This report is one of many exceptional audits we have produced together since 2007 when he first served as my Assistant City Auditor. He is a gifted professional, a dear friend, and a trusted confidant. As Mike ventures into retirement, we thank him for making all of us in the City Auditor's office better auditors and for his dedicated service to the City of Oakland.



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April 14, 2021

HONORABLE MAYOR
HONORABLE CITY COUNCIL
HONORABLE CITY ATTORNEY
HONORABLE COMMISSIONERS
CITY ADMINISTRATOR
OAKLAND RESIDENTS

**RE: PERFORMANCE AUDIT OF THE CITY OF OAKLAND'S HOMELESS ENCAMPMENT
MANAGEMENT INTERVENTIONS AND ACTIVITIES**

Dear Mayor Schaaf, City Council President Bas, Members of the City Council, City Attorney Parker, Members of the Commission on Homelessness, City Administrator Reiskin, and Oakland Residents:

For several years, the residents of Oakland have identified homelessness as the most pressing issue facing our City. As such, this audit was a priority for both the City Auditor's Office and the City Council. I want to acknowledge City Council President Bas for her leadership on this issue, and her collaboration in defining the audit objectives with my office. This audit report is the first of two audit reports on homelessness.

The audit found the City's efforts to address homelessness are akin to those of other local governments dealing with the growing number of unsheltered residents in their communities, which has only worsened by the severe economic impact of the COVID pandemic. In July 2019, Alameda County released its Homeless Point-in-Time count, indicating the number of homeless residents living in Oakland between 2015 and 2019 had increased from 2,191 to 4,071, an increase of 86 percent. Nearly 79 percent of these individuals were unsheltered due to the lack of permanent affordable housing options, coupled with limited emergency and temporary housing options. The count also identified that 70 percent of Oakland's homeless population are African American, compared to 24

percent in the general population. Moreover, the vast majority of known homeless encampments are within communities of concern.

The impacts of homeless encampments are far-reaching, affecting the City's housed and unhoused residents, City workers, City services, businesses, and the community. The purpose of the audit was to examine the City's practices for managing the numerous encampments throughout the City. Specifically, the audit objectives were to determine the cost of encampment interventions and activities, determine how many encampments exist in the City of Oakland, assess the quality of conditions at encampments, assess whether the City is achieving its goals and objectives, and determine response times for 911 and 311 calls. Also, we assessed the closure notification process, the bag-and-tag process, and the quality of data around encampment management services and activities and identified best practices employed by other local governments as well.

The increase in homeless residents resulted in a significant rise in the number of encampments. The City estimates that at least 140 encampments are scattered throughout the City, and this estimate may be conservative. In response to the rise in encampments, the City established the Encampment Management Team (EMT) in 2017, a multi-departmental team to coordinate the City's encampment response. The EMT developed an Encampment Management Policy (EMP), designed to address the physical management of homeless encampments and establish criteria for determining the types of interventions to undertake at encampments.

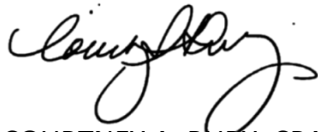
The audit found the City was not adequately prepared to shoulder such a massive project and the EMT was overwhelmed by the undertaking of closing and cleaning encampments throughout Oakland. Specifically, the audit found the City lacked an effective strategy for dealing with the growth in encampments and did not provide sufficient policy direction or adequate funding at the onset of this crisis. Additionally, the EMT lacked sufficient resources, including a budget. The audit also identified the City needs more complete data on encampment activities, increased outreach, improved notification before encampment interventions occur, improved collection of encampment residents' belongings during interventions, and a formal transportation policy to assist encampment residents in relocating. Overall, the audit found the City needs to establish and fund a formal encampment management program to address the findings in the audit and to put in place effective management systems to implement, evaluate, and monitor the new encampment policy passed in October 2020.

Every day our unhoused residents are exposed to unsanitary and dangerous conditions and are vulnerable to serious health risks and significant safety hazards that threaten their lives. As leaders and policymakers across the country seek timely affordable housing solutions and come up with creative policies to help our unsheltered, we on the West Coast, and the

Bay Area specifically, are called to work at a faster pace than most. Our housed and unhoused residents are counting on us to make this right. It is both a humanitarian duty and a civic expectation that our homeless become housed, and our City streets and parks are returned to their intended public uses.

This is a very complex problem requiring every level of government to participate through policy, funding, leadership, and cooperation. COVID has required an unprecedented amount of intergovernmental, business, and nonprofit coordination. Addressing the root causes of homelessness and affordability will require a similar commitment in which we all come together with a sense of urgency, respect, commitment, and shared purpose.

Sincerely,

A handwritten signature in black ink, appearing to read 'Courtney Ruby', with a stylized flourish at the end.

COURTNEY A. RUBY, CPA, CFE
City Auditor

Oakland's City Auditor is an elected official and works for, and reports to, the residents of Oakland. The Auditor's job is to provide oversight to the City's activities. The Auditor has the authority to access and audit City financial and administrative records, plus the policies and procedures of all City agencies and departments.

To make sure this work is done objectively and without bias, the City Auditor is not connected to any other City departments and has no day-to-day financial or accounting duties for the City of Oakland. This autonomy allows for independent analyses, ensuring tax dollars and other resources serve the public interest.

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Executive Summary

OVERVIEW

This report examines the City of Oakland's encampment management services and activities and has four sections. Section 1 discusses the impacts of encampments on Oakland residents, both housed and unhoused, City staff, City services, businesses, and the community, as well as the City's efforts to mitigate the impacts of encampments. Section 2 addresses the Police Department's and the Fire Department's response times to 911 emergency calls at encampments and the City's response to the 311 Call Center service requests at encampments. Section 3 includes estimates of the City's costs associated with encampment activities. Specific cost details and the roles and responsibilities of staff working on encampment activities, and the audit methodology to estimate such costs, are shown in the Appendix. Finally, Section 4 provides guidance for the City Administration to more effectively implement the City's new encampment policy.

BACKGROUND

Cities across the country, especially the West Coast, are facing a homelessness crisis. The federal Department of Housing and Urban Development released a study in late 2019, which stated, "While the rest of the country experienced a combined decrease in homelessness in 2019, significant increases in unsheltered and chronic homelessness on the West Coast, particularly California and Oregon, offset those national decreases, causing an overall increase in homelessness of 2.7 percent in 2019." The study found 567,715 persons experienced homelessness on a single night in 2019, an increase of 14,885 homeless individuals since 2018.

Oakland has been significantly impacted by the homelessness crisis. In July 2019, Alameda County released its Homeless Point-in-Time count, indicating the number of homeless residents living in Oakland between 2015 and 2019, increased from 2,191 to 4,071, an increase of 86 percent. Nearly 79 percent of these individuals were unsheltered due to a lack of permanent affordable housing options coupled with limited emergency and temporary housing options.

Oakland, like other jurisdictions, has experienced a significant increase in the number of encampments. However, the number of encampments and the number of residents occupying encampments changes frequently and is difficult to quantify. A 2018 report identified 329 encampments in the City of Oakland. In comparison, the City's May 2019 master list of encampments identified 87 specific encampments and the City's master list of encampments in October 2020 included 140 encampments.

Like other cities, the City of Oakland established a multi-departmental team, the Encampment Management Team (EMT), in 2017, to coordinate its response to the numerous encampments throughout the City. The goal of the team is to address issues arising from the increase in encampments and coordinate the City's response to managing encampments. The EMT was initially comprised of staff from the following departments and outside agencies: City Administrator's Office, Public Works, Human

Executive Summary

Services, Transportation, Police, Fire, Parks, Recreation and Youth Development, the Mayor's Office and Alameda County Vector Control. On occasion, representatives from Bay Area Rapid Transit (BART), Caltrans, Alameda County's Homeless Response Team, and other agencies and City departments also participate.

OBJECTIVES

A City survey of Oakland residents reported that homelessness and affordability of housing were the two biggest issues that Oakland residents wanted addressed in the City's upcoming two-year budget cycle. Conducting an audit addressing homelessness was a high priority for the City Auditor since taking office in January 2019; it was also a high priority for the Oakland City Council (City Council). Accordingly, the City Auditor and City Council identified the following points for the audit to consider:

1. Determine the cost of the encampment management services.
2. Determine how many encampments exist in the City of Oakland.
3. Assess the quality of conditions at encampments.
4. Assess whether the City is achieving its goals and objectives.
5. Determine response times for 911, 311, and 211 calls.
6. Determine how many homeless are served in encampments, including the number receiving permanent housing and retention rates on permanent housing.
7. Assess the closure notification process.
8. Assess the bag-and-tag process.
9. Identify best practices.
10. Assess the quality of data around the encampment management services.
11. Assess the coordination, partnerships, and performance of City departments, other governmental agencies, and contractors.

This audit is not intended to address all aspects of homelessness. For instance, this audit will not assess shelter options such as Community Cabins, recreational vehicles (RV) sites, transitional housing, and other shelters. The audit also does not address the causes or solutions to homelessness. Rather, this report focuses on the City's encampment management services and activities. It also includes information related to encampment conditions, but due to the COVID-19 (COVID) pandemic, the City Auditor was unable to perform a formal assessment of the quality and conditions of encampments. In addition, we did not assess 211 response times given this is a county system that connects residents with a broad scope of services.

Additionally, the City Auditor will issue a separate audit report at a later date to address the following issues: 1) assessing the coordination, partnerships, and performance of City departments, other governmental agencies, and contractors, and 2) determining the number of encampment residents receiving permanent housing and corresponding retention rates.

WHY THIS AUDIT MATTERS

This audit report provides critical information to City policymakers and City staff to assist them in overseeing and managing the City's encampment activities. For instance, the report highlights the

Executive Summary

significant impacts encampments have on encampment residents, the community, business, and City staff, as well as the City's efforts to mitigate these impacts. Moreover, the report identifies opportunities to enhance the City's intervention efforts. The report also includes information on the Police Department and the Fire Department's response to emergencies at encampments. This information is valuable for policymakers to ensure encampment residents are receiving appropriate and equitable service. To manage the City's encampments, the report estimates the City has incurred approximately \$12.6 million in costs, most of it unbudgeted, over the last two fiscal years. Reliable cost information is critical for City policymakers to have in order to develop informed encampment management policy decisions and appropriately budget for encampment services and activities. The report ends by providing a roadmap for the City Administration to more effectively implement the City's new encampment policy, scheduled to take effect in January 2021.

KEY FINDINGS AND SUMMARY OF RECOMMENDATIONS

Section 1: The impacts of encampments are far-reaching—affecting the City's housed and unhoused residents, City workers, City services, businesses, and the community.

- **Encampments:**
 - are unhealthy for its residents due to unsanitary (i.e., vermin, lack of clean water, garbage, needles, etc.) and dangerous living conditions (i.e., murders, drug use, etc.), fires, and health risks to vulnerable individuals.
 - have significantly impacted City staff through traumatic experiences, dangerous working conditions, and other safety risks. As a result, multiple City staff have filed workers' compensation claims, one of which resulted in an employee receiving \$19,000 in compensation.
 - have impacted City services through an increased demand for public safety and service requests. Additionally, multiple legal actions have been filed against the City.
 - have had significant impacts on Oakland businesses and their clients/customers and staff. Additionally, businesses have reported damage to property and safety concerns.
 - have significantly impacted the community through destroyed or compromised City parks, illegal dumping, environmental issues, damaged or blocked public rights-of-way and traffic signals, and damage to other public infrastructure.
- The EMT coordinates and schedules the City's encampment interventions, which include closures, cleanings, and garbage and hygiene services, based on the initial Encampment Management Policy.
- The City conducted nearly 2,100 interventions in FY 2018-19 and FY2019-20. These interventions included a total of approximately 500 closures, re-closures, and cleanings. Additionally, the City provided nearly 1,600 garbage pickups and other hygiene services such as installing and maintaining showers and portable toilets.
- The City faced numerous challenges in addressing the growing number of encampments including, but not limited to, the lack of affordable housing, the lack of shelter options, shelter options that did not meet the personal needs of homeless individuals, and legal actions that delayed the City's intervention efforts.

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- The EMT and the City were overwhelmed by the undertaking of closing and cleaning encampments because the City was not adequately prepared to undertake such a massive project. Specifically, the City lacked an effective strategy for dealing with the growth in encampments and did not provide sufficient policy direction or adequate funding at the onset of this crisis, and the EMT lacked sufficient resources, including a budget.
- Opportunities exist to enhance the City's encampment interventions by:
 - improving the information on the schedule of interventions,
 - documenting the criteria for determining which encampments receive garbage and hygiene services.
 - enhancing outreach efforts and re-assessing the notification process for interventions, improving the bag-and-tag process, and
 - developing a clear policy on transportation provided to residents at closures.

This section includes 10 recommendations to: improve the organizational structure of the EMT; ensure adequate recordkeeping for interventions; better define when services are provided to encampments; improve outreach, the intervention notification process, and the bag-and-tag process; and develop a comprehensive policy for providing transportation assistance when encampments are closed. A more detailed and comprehensive list of these 10 recommendations are listed on page 39 of the report and the City Administration has agreed to implement these 10 recommendations.

Section 2: The Police Department's response times to 911 emergency calls at encampments were not timely, but the Fire Department's responses to fire emergencies at encampments were timely, and the response time to 311 service requests need further examination.

- Police Department
 - In FY 2018-19, the Police Department received 823 calls to encampments. We were unable to analyze all these calls because response data was incomplete. Accordingly, we analyzed 572 calls in which the data was complete. Most of these calls to encampments were Priority 2, which ideally should be responded to in 10 to 15 minutes. The Police Department, however, responded to these calls in an average of 4 hours. The range of response times was 0 to 54 hours and the median response time was 2 hours.
 - In FY 2019-20, the Police Department received 636 calls to encampments. We analyzed 416 of these calls. Again, most of these calls to encampments were Priority 2 calls. The Police Department's response to these calls averaged 6 hours, the median response time was approximately 3 hours, and response times ranged from 0 to 153 hours. For the one Priority 3 call, the Police Department responded in approximately 7 hours.
- Fire Department
 - The Fire Department responded to 988 encampment related fires in fiscal years 2018-19 and 2019-20.
 - The Fire Department responded to 90 percent of these calls in less than 8 minutes in fiscal years 2018-19 and 2019-20.

Executive Summary

- We were unable to assess the response time for medical emergencies because the Fire Department currently does not track data for calls for medical emergencies at encampments.
- 311 Call Center
 - In calendar years 2018 and 2019, the Call Center received a total of 1,152 calls related to encampments.
 - 311 Call Center response times are based on closed service requests. In calendar year 2018, there were 299 closed cases and the average response time was 22 days. In calendar year 2019, there were 152 closed cases and the average response time was 39 days.
 - Given the gravity of the homeless crisis, the response times are concerning, and the Administration should evaluate both the integrity of the data and the resolution of calls regarding encampments.

This section includes three recommendations to better identify all police and fire emergencies at encampments and improve tracking of 311 calls concerning encampments. A more detailed and comprehensive list of these three recommendations are listed on pages 44-45 of the report and the City Administration has agreed to implement these three recommendations.

Section 3: The City incurred approximately \$12.6 million in direct costs associated with encampment activities in fiscal years 2018-19 and 2019-20. Most of these costs were unbudgeted and resulted in the City forgoing other services to redirect staff and resources to encampment activities

- The City did not budget and track costs for encampment management activities
- The audit estimates that the City incurred approximately \$12.6 million in direct costs associated with encampment activities in FY 2018-19 and FY 2019-20.
- The audit estimates the hourly cost of closures and cleanings to be \$1,464 per hour.
- The audit could not quantify the cost of a second crew, which is used on larger interventions, or days with multiple interventions.
- In addition to incurring costs, encampment activities are diverting time and resources from other City services like illegal dumping and fire inspections.

This section includes one recommendation to improve recordkeeping for tracking and monitoring costs on encampment activities. A more detailed recommendation is listed on page 51 of the report and the City Administration has agreed to implement this recommendation.

Section 4: The City needs to develop and implement formal management systems to effectively administer the new encampment policy

- The City Council adopted a new Encampment Management Policy in 2020 designating high and low sensitivity areas, determining findings that will prompt EMT interventions, and providing

Executive Summary

guidance on addressing unreasonable health and safety risks, promoting voluntary compliance, and strategies to address non-compliance.

- The 2020 Encampment Management Policy also includes an equity provision in recognition that 70 percent of Oakland’s homeless population are African American, and the vast majority of known encampments are within communities of concern.
- To be more proactive, programmatic, and strategic, the City will need to create a more formal program to manage the encampment services and activities. The program should include
 - establishing measurable goals and objectives,
 - developing written strategic plans for achieving goals and objectives,
 - establishing formal systems for assessing progress in implementing strategies,
 - developing annual work plans to implement strategies and achieve goals and objectives,
 - developing annual budgets and tracking costs for encampment management activities,
 - determining the appropriate staffing levels, the appropriate composition of staff, and defining the roles, responsibilities, and authority of staff,
 - developing written policies and procedures to guide the implementation of the new policy,
 - developing data collection systems to manage encampment activities, and
 - ensuring staff are adequately trained.

This section includes 12 recommendations to establish a formal encampment management program with appropriate controls in place to effectively manage the City’s new encampment management policy. These controls include goals and objectives, developing a strategic plan and annual work plans, establishing formal systems for tracking progress in implementing strategies, developing a budget and comprehensive system for tracking costs of encampment activities, assessing staffing requirements, defining the roles and responsibilities of staff, developing written policies and procedures, developing data collection systems, assigning responsibility for maintaining an up-to-date list of all encampments in the City, and developing training programs for staff working on encampment activities. A more detailed and comprehensive list of these 12 recommendations is listed on pages 60-62 of the report and the City Administration has agreed to implement all 12 of these recommendations.

Introduction and Background

Introduction

Homelessness, homeless encampments, and housing affordability are among the biggest issues facing the City of Oakland (City). Accordingly, the City Auditor placed a high priority on performing an audit of homeless services and put it at the top of her annual workplan, soon after taking office in January 2019. In June 2019, the Oakland City Council (City Council) also requested the Office of the City Auditor (City Auditor) examine the City's practices for managing the numerous encampments¹ throughout the City. The City Auditor and City Council identified the following points for the audit to address:

1. Determine the cost of the encampment management services.
2. Determine how many encampments exist in the City of Oakland.
3. Assess the quality of conditions at encampments.
4. Assess whether the City is achieving its goals and objectives.
5. Determine response times for 911, 311,² and 211³ calls.
6. Determine how many homeless are served in encampments, including the number receiving permanent housing and retention rates on permanent housing.
7. Assess the closure notification process.
8. Assess the bag-and-tag⁴ process.
9. Identify best practices.
10. Assess the quality of data around the encampment management services.
11. Assess the coordination, partnerships, and performance of City departments, other governmental agencies, and contractors.

This audit is not intended to address all aspects of homelessness. For example, this audit will not assess shelter options such as Community Cabins, recreational vehicles (RV) sites, transitional housing, and other shelters. Rather, this report is focused on the City's encampment management services and activities. Due to the COVID-19 (COVID) pandemic, the City Auditor was unable to perform a formal assessment of the quality and conditions of encampments, however, the report does include information related to encampment conditions. Additionally, the following issues will be addressed in a separate audit report at a later date: 1) assessing the coordination, partnerships, and performance of City departments, other governmental agencies, and contractors, and 2) determining the number of encampment residents receiving permanent housing and corresponding retention rates.

This report has four sections. Section 1 discusses the impacts of encampments on Oakland residents, both housed and unhoused, City staff, City services, and the community, as well as the City's efforts to mitigate the impacts of encampments. Section 2 addresses the Police Department's and Fire

¹ The term encampment is widely used to describe homeless individuals choosing to live together in groups, which may also be referred to as tent cities, homeless settlements, and homeless camps. The nature of encampments, as well as the definition of and what constitutes an encampment, is further discussed later in the Background section and throughout the report.

² OAK 311 is a service to make it easier for Oaklanders to report problems and request infrastructure maintenance. For more information on OAK 311, click [here](#).

³ We did not assess 211 response times because it is an Alameda County program that connects residents with a broad scope of health and human services in their community. For more information on 211, click [here](#).

⁴ The City of Oakland's bag-and-tag process is a system to bag up, tag, and store the belongings of encampment residents during an encampment closure, so encampment residents can later retrieve their belongings.

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Department's response times to 911 emergency calls at encampments and the City's response to the 311 Call Center service requests at encampments. Section 3 includes estimates of the City's costs associated with encampment activities. Specific cost details and the roles and responsibilities of staff working on encampment activities, and the audit methodology to estimate such costs, are shown in the Appendix. Finally, Section 4 provides guidance for the City Administration to more effectively implement the City's new encampment policy.

Background

What is homelessness?

According to the Oxford Encyclopedia of Social Work, homelessness is formally defined by the United States government as a condition in which a person "lacks a fixed, regular, and adequate nighttime residence, and if they sleep in a shelter designated for temporary living accommodations or in places not designated for human habitation."

Who are the homeless?

To address the diversity within the population experiencing homelessness, the federal Department of Housing and Urban Development (HUD) defines four subpopulations. These subpopulations are:

- Chronically homeless – defined by HUD as an unaccompanied individual or head of a family household with a disabling condition, who has either continuously experienced homelessness for more than a year or has experienced at least four episodes of homelessness totaling 12 months, in the past three years,
- Unaccompanied children – children under the age of 18 who are not accompanied by a parent or guardian,
- Persons in families with children – at least one adult and one child under the age of 18, and
- Veterans – persons who have served in the military.

Counting the homeless

Although it may not be possible to know the exact number of people experiencing homelessness, the primary data for measuring homelessness trends is the Point-in-Time count, a nationwide count of the number of people that meet the HUD definition of homelessness on a single night in January.

The Point-in-Time counts are considered conservative for several reasons. HUD acknowledges that factors such as a distrust of public services, mental health issues, and a desire to not be found make it difficult to count the homeless population. Also, the definition of homeless differs amongst other federal agencies. For example, HUD guidelines specify that only institutions with space dedicated to people experiencing homelessness are included in the Point-in-Time count. As a result, the count does not include individuals experiencing homelessness who are in jail, hospitals, or substance abuse treatment facilities on the night of the count. Also, HUD does not consider children living in motels or hotels or living with relatives as homeless, with several exceptions. However, the Department of

Introduction and Background

Education and the Department of Health and Human Services consider children living in hotels and motels or staying with others that are not relatives as homeless.

National trends in homelessness

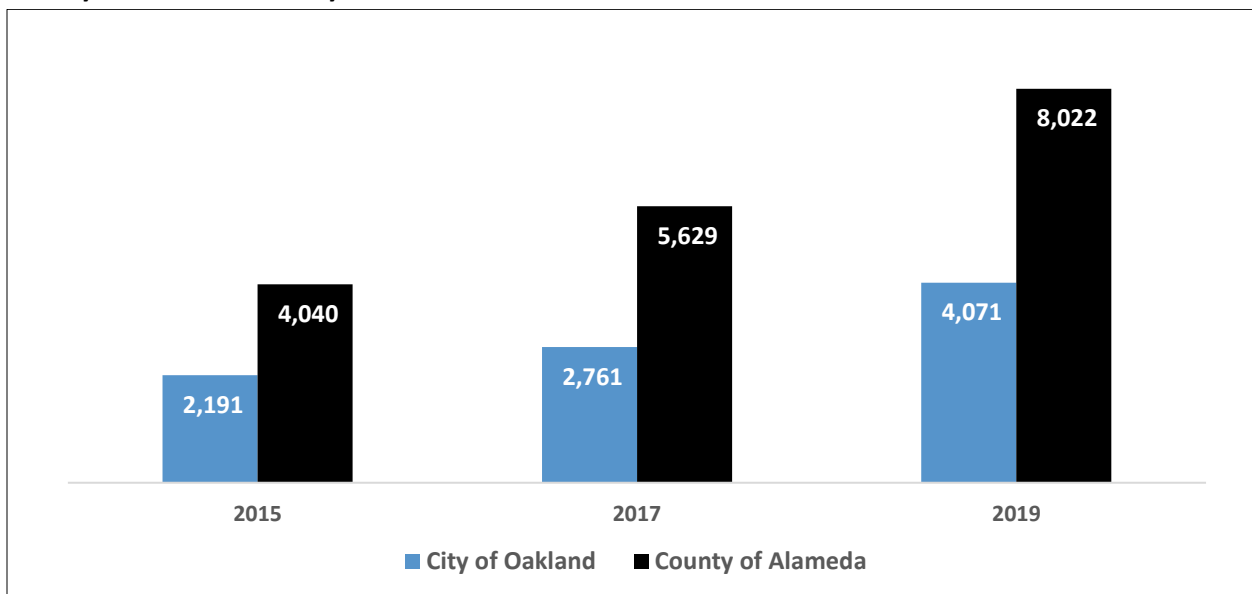
Cities across the country, like Oakland, are facing a homelessness crisis. A HUD study released in late 2019, reported that “While the rest of the country experienced a combined decrease in homelessness in 2019, significant increases in unsheltered and chronic homelessness on the West Coast, particularly California and Oregon, offset those national decreases, causing an overall increase in homelessness of 2.7 percent in 2019.” The study found 567,715 persons experienced homelessness on a single night in 2019, an increase of 14,885 homeless individuals since 2018.

Oakland and Alameda County trends in homelessness

In July 2019, Alameda County released its Homeless Point-in-Time count, indicating the number of homeless residents living in Oakland between 2015 and 2019, increased from 2,191 to 4,071, an increase of 86 percent. Nearly 79 percent of these individuals were unsheltered due to a lack of permanent affordable housing options coupled with limited emergency and temporary housing options.

As shown in Exhibit 1 below, homelessness in Alameda County and Oakland is at its highest level in the last five years. Between 2015 and 2019, the number of homeless in Oakland and Alameda County nearly doubled.

Exhibit 1: Total number of individuals experiencing homelessness in the City of Oakland and Alameda County between calendar years 2015 – 2019



Source: Alameda County Point-in-Time Count and Survey from 2015, 2017, and 2019

Exhibit 2 below shows the subpopulations in Oakland and Alameda County as of the 2019 Point-in-Time count.

Introduction and Background

Exhibit 2: Total number of federally reported subpopulations experiencing homelessness in the City of Oakland and Alameda County in 2019

Subpopulation Category	City of Oakland		Alameda County	
	#	%	#	%
Unaccompanied Youth and Young Adults	468	11%	731	9%
Persons in Families with Children	198	5%	524	7%
Chronically Homeless	865	21%	2,236	28%
Veterans	361	9%	692	9%
Homeless Individuals not categorized in the above subpopulations	2,179	54%	3,839	48%
Total Homeless Population	4,071	100%	8,022	100%

Source: Alameda County Point-in-Time count and survey 2019

As Exhibit 2 shows, in January 2019, the Point-in-Time count identified 8,022 homeless individuals in Alameda County, of which, 4,071 were located in Oakland. Unaccompanied youth and young adults represented 468 individuals, or 11 percent of the homeless population in Oakland. Persons in families with at least one adult and one child under the age of 18 represented 198 individuals, or 5 percent of the overall homeless population. This was a decrease from 2017, when families represented 9 percent of the population (262 individuals). Veterans represented 361 individuals, or 9 percent of the homeless population. HUD does not categorize all homeless into one of these subgroups. In 2019, more than half or 2,179 homeless individuals were not categorized into any of the four subpopulations.

As noted above, the Homeless Point-in-Time count is considered a conservative count of persons experiencing homelessness. Various agencies have different methodologies for determining the numbers of homeless individuals and families. For example, a January 2021 report issued by the Oakland-Berkeley-Alameda County Continuum of Care found that, in Oakland, 6,087 households, without children were experiencing homelessness and 499 families with children were experiencing homelessness.

According to the Point-in-Time count, Black/African Americans are disproportionately affected by homelessness. In Alameda County, Black/African Americans represent 11 percent of the County's general population but make up 47 percent of the homeless population. In Oakland, Black/African Americans represent 24 percent of the City's general population but make up 70 percent of the City's homeless population.

The next Point-in-Time count was scheduled for January 2021 but was delayed due to of the COVID pandemic.

Introduction and Background

All levels of government, the private sector, and nonprofits are working to address homelessness

Agencies from all levels of government and within the private and nonprofit sectors have dedicated resources to address homelessness through various programs and services. We have listed several agencies and their programs and services below.

Federal agencies

U.S. Department of Housing and Urban Development (HUD)

- Provides funding to states and local governments and nonprofit providers to serve individuals and families across the country who are affected by homelessness.
- Serves over one million people through emergency, transitional, and permanent housing programs each year.

U.S. Interagency Council on Homelessness (USICH):

- Comprises 19 federal member agencies and is charged with coordinating the federal response to homelessness by fostering partnerships at every level of government and the private sector.
- Provides expert guidance to communities and leads interagency working groups to design and implement strategies to end homelessness. USICH develops tools and guidance to support all communities in implementing best practices and it leads the interagency implementation of the federal strategic plan, *Home Together*, to prevent and end homelessness.

State of California

Multiple state entities in California administer a variety of homeless service programs:

- The Business, Consumer Services, and Housing Agency (BCSH) administers the Homeless Emergency Aid Program (HEAP), which provides a total of \$500 million in one-time funding to localities. This funding is meant to assist localities in addressing their immediate homelessness challenges.
- The Department of Housing and Community Development, the California Department of Social Services, the California Housing Finance Agency, California Tax Credit Allocation Committee, and the Homeless Coordinating and Financing Council (HCFC) administer some of the state's longest standing and/or largest housing and homelessness programs.
- Other state departments administer programs that address homelessness indirectly. Those departments include the Department of Health Care Services, the Department of Veterans Affairs, the Office of Emergency Services, and the Department of Corrections and Rehabilitation.

Alameda County

Multiple county agencies and departments administer a variety of homeless programs:

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- County Encampment Response Team (ERT) has been established to coordinate responses to encampments, with an initial focus on unincorporated county areas and prioritizing other County-managed properties.
- Alameda County Homeless Council developed an ‘Encampment Toolkit’ that includes a framework and policies to be piloted within unincorporated areas to assist unsheltered persons. The toolkit will also be modified so that it can be utilized in City-County partnership agreements.
- Alameda County’s Public Health Department has partnered with Oakland to implement vector and rodent control, as well as a Hepatitis A vaccine program for residents in encampments.
- The City and County have been working together to provide a variety of interventions to address COVID among unsheltered individuals. This includes moving homeless individuals into hotels and RV’s and providing COVID tests.
- Other County agencies and departments address homelessness, including the Health Care Services Agency, the Housing and Community Development Department, and the Social Services Agency.

Organizations and service providers around the Bay Area

Numerous organizations provide a variety of services to the homeless including, but not limited to

- Bay Area Community Services,
- Building Futures with Women and Children,
- East Oakland Community Project,
- Health Care for the Homeless,
- Lifelong Medical,
- Operation Dignity, and
- Roots Community Health Center.

Many informal groups, faith-based organizations, and private individuals visit encampments regularly to provide food and personal items.

What is the City of Oakland doing in response to homelessness?

The City has initiated numerous actions to address homelessness in Oakland. In 2006, the City developed the Permanent Access to Housing (PATH) framework as a roadmap for ending homelessness. In 2019, the City updated the PATH framework to align the City’s efforts with national best practices and to focus on homelessness within the City. The PATH framework aims to reduce the number of people experiencing homelessness. Specifically, the framework

- Provides an outline for addressing homelessness across the full spectrum of services from prevention, intervention, and solutions to end homelessness.
- Identifies the scale and scope of the investments needed to make substantial change in the current crisis.
- Seeks to align all stakeholders on the importance of investing across the spectrum of services and in setting ambitious measurable goals.
- Points to the absolute need to increase revenues.

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- Informs policy makers about what to advocate for from federal, state, county, and private funding partners.

Additionally, the PATH framework outlines strategies to reach its goals and commits to measuring the effectiveness of these strategies annually for the life of the plan. The framework outlines specific strategies⁵ to reduce homelessness in Oakland by

- Reducing the number of people who become homeless each year.
- Increasing the number of people returning to housing as quickly as possible.
- Expanding, improving and maintaining crisis response beds.
- Assisting people in securing the incomes and support they need to avoid returning to homelessness.
- Expanding the supply of deeply affordable and supportive housing for Oakland's most vulnerable residents.
- Addressing impacts of unsheltered homelessness on sheltered and unsheltered neighbors.

The City's Crisis Response and Long-term/Permanent Housing Options

The City offers two types of housing options: crisis response and long-term/permanent housing. Crisis response beds provide temporary night-by-night shelter or lodging for those experiencing homelessness. These include transitional housing, shelters, RV Safe Parking, Operation HomeBase, and Community Cabins. Since 2017, the City has significantly reduced its capacity to house the homeless in shelters, transitional housing, community cabins, and RV sites. According to Human Services, the City has more than doubled its capacity over the last three years. Additionally, the City offers long-term/permanent housing options including: rapid re-housing, Project HomeKey, and long-term re-housing services. The City's crisis response and long-term/permanent housing options are described below.

Crisis response options

Transitional housing

The City and its contractors oversee five transitional housing programs: 1) Families in Transition, 2) the Matilda Cleveland, 3) the Oakland Homeless Youth Housing Collaborative, 4) the Holland, and 5) the Henry Robinson Center. Each program is intended to provide transitional housing services to stabilize unhoused residents and provide resources to prepare them to transition to permanent housing.

Shelters

The City funds or partially funds nonprofits to operate four low-barrier emergency shelters for single adults and for families: 1) Crossroads Shelter, 2) Family Matters, 3) St. Vincent de Paul, and 4) Building Futures with Women and Children shelters. The shelters do not provide transitional or long-term housing. Each shelter provides slightly different services to its clients. Services include two to three

⁵ The PATH framework outlines more specific goals, which can be found [here](#).

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meals per day, drinking water, clean bathrooms and showers, and varying levels of case management services and aftercare support.

Operation HomeBase

In response to the COVID pandemic, the City received 67 RVs donated by the State of California. The City uses these vehicles to provide medically vulnerable unsheltered residents a safe space to maintain social distancing. Operation HomeBase can serve a maximum of 128 people at any given time. Participants must either be 65 years of age or older or have an underlying medical condition that makes them more vulnerable to complications from COVID. The program was funded by a combination of funds from the State of California's Emergency COVID Response Fund, and a \$500,000 donation from a private donor. The City also anticipates receiving some reimbursement for its expenses related to the COVID pandemic from the Federal Emergency Management Agency (FEMA).

Recreational Vehicle (RV) Safe Parking

The City has three RV Safe Parking sites: 1) High Street, 2) 71st Avenue, and 3) Beach Street. The City contracts with nonprofit partners to manage the sites. Each site consists of a parcel of publicly or privately-owned land, where residents can legally park their RV (regardless of whether it is operable). The sites are intended to provide a safe and healthy option for residents who reside in RVs. Currently, the RV Safe Parking program has the capacity to host 108 RVs, depending on the size and available spaces at the sites.

Community Cabins

The Community Cabin sites are a coordinated grouping of small shelters that sleep two people per unit. The City has six Community Cabin sites: 1) Lake Merritt, 2) Mandela North, 3) Mandela South, 4) Northgate, 5) Miller, and 6) Oak Street. Like the RV Safe Parking sites, day-to-day operations at each site are managed by different nonprofit organizations contracted by the City to provide site maintenance, housing navigation services, and site security. Residents have access to support services provided by the contracted nonprofit organizations. Community Cabins are available to adults over the age of 18 and are not intended to be a long-term housing solution, but rather a stepping stone to help residents gather the resources needed to secure permanent housing. Currently, the Community Cabin program has a capacity to house 232 individuals at any given time.

Exhibit 3 below summarizes the City's crisis response bed capacity, which provides temporary shelter or lodging for those experiencing homelessness.

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Exhibit 3: Summary of crisis response bed options and capacity

Crisis Response Bed Options	Name	Number of Beds	Accommodates Families ⁶
Transitional Housing	Families in Transition	28	X
	Matilda Cleveland	43	X
	Oakland Homeless Youth Housing Collaborative	22	
	Holland	85	
	Henry Robinson	137	
Shelters	Crossroads Shelter	142*	X
	Family Matters	62	X
	St. Vincent de Paul	100	
	Building Futures with Women and Children Shelters	20	X
Operation HomeBase	Operation HomeBase	128	
RV Safe Parking	High Street	90	
	71st Avenue	92	
	Beach Street	34	
Community Cabins	Lake Merritt	40	
	Mandela North	38	
	Mandela South	38	
	Northgate	40	
	Miller	38	
	Oak Street	38	
	Total Number of Beds	1,215	

* This includes 10 beds only available in the winter

As Exhibit 3 above shows, for crisis response housing options, the City has a total of 1,215 beds available.

⁶ The number of available beds for housing options accommodating families are based on the average size of homeless families, which is 3.1 family members. Additionally, the number of available beds for RV sites are based on 2 people per RV.

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Long-term/permanent housing options

Rapid re-housing

The City and its contractors oversee three rapid re-housing options: 1) North County Family, 2) North County Youth, and 3) St. Mary's. These options provide move-in assistance, short-term rental subsidies, and connection to support services to quickly transition homeless households to a permanent housing solution. Currently, these three sites provide a total of 169 beds.

Project Homekey Initiative

Project Homekey is a statewide grant initiative, where local jurisdictions and their development partners acquire and rehabilitate a variety of housing types, including (but not limited to) hotels, motels, vacant apartment buildings, and residential care facilities to serve people experiencing and/or at risk of experiencing homelessness or who are also at risk of serious illness from COVID.

As part of its Project Homekey Initiative, the State of California awarded the City of Oakland \$21.3 million for three housing projects: 1) Clifton Hall, 2) Inn at Temescal, and 3) scattered sites throughout the City. These three projects provide a total of 171 units for people experiencing or at risk-of homelessness. Clifton Hall, a dormitory building previously owned by the California College of the Arts, has 61 units and is located in the Rockridge neighborhood. The Inn at Temescal is an existing hotel located in the Temescal neighborhood and has 21 units for veterans experiencing homelessness and at severe risk of contracting COVID. The City, in partnership with the Bay Area Community Services (BACS), acquired funds through Project Homekey to provide 89 units of housing in locations scattered throughout Oakland.

Long-term re-housing services

The two providers, Abode Services and First Place for Youth, are social service and housing providers that aim to re-house people in need. Currently, in Oakland these providers have 125 units for adults and youth aged 18 to 24, including families. Beginning in FY 2020-21, the providers may be able to serve up to an additional 40 families.

Exhibit 4 below summarizes the City's long-term/permanent housing options for those experiencing homelessness. These include rapid re-housing, Project Home Key, and long-term re-housing services.

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Exhibit 4: Summary of long-term/permanent housing options

Long-term/Permanent Housing Option	Name	Number of Beds	Number of Units ⁷	Accommodates Families ⁸
Rapid Re-Housing	North County Family Rapid Re-Housing	118		X
	North County Youth Rapid Re-Housing	40		
	St. Mary’s Rapid Re-Housing	11		
Project Homekey	Clifton Hall Dorm		61	
	Temescal Inn		21	
	Scattered sites		89	
Long-Term Re-Housing Services	Adobe		100	X
	First Place for Youth		25	X
	Total Number of Beds and Units	169	296	

Between rapid-rehousing, Project Homekey, and long-term subsidies and services, the City has a total of 169 beds and an additional 296 units available.

The City established an Encampment Management Team to coordinate the City’s response to the increase in encampments

What is an encampment?

Cities, suburban communities, and rural areas across the United States have seen, in recent years, a rise in the number of people experiencing unsheltered homelessness and choosing to live together. The term encampment is widely used to describe these groups, but other terms include tent cities, homeless settlements, and homeless camps. Federal, state, and local governments, including Oakland, do not have a single definition of what constitutes an encampment. This issue will be discussed further in Section 4.

The term encampment has connotations of both impermanence and continuity. People are staying in temporary structures or enclosed places that are not intended for long-term continuous occupancy. Inhabitants may be a core group of people who are known to one another and who move together to different locations when necessary, or they may be a changing group of people who cycle in and out of a single location. The physical structures that make up encampments can take many forms, including tents on pallets and shanties, or lean-to shacks built with scavenged materials. Structures may be simple or complex multi-room compounds. People experiencing homelessness in encampments may also stay in

⁷HUD defines a unit as a house, apartment, group of rooms, or single room occupied, or intended as occupancy, as separate living quarters.

⁸As noted in footnote 6, the number of available beds for housing options accommodating families are based on the average size of homeless families, which is 3.1 family members.

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groups of cars or vans or in man-made tunnels and naturally occurring caves. According to a HUD report, several related factors seem to influence whether people experiencing homelessness prefer to stay in encampments, instead of shelters or other unsheltered locations. These factors include: 1) shortcomings in the shelter system, 2) a sense of safety and community within encampments, and 3) a desire for autonomy and privacy.

Specific shortcomings in the shelter system contribute to increased numbers of people congregating in encampments such as

- an insufficient supply of shelter beds to meet the demand,
- restrictions in shelters that would result in separation from a partner, family member, or pet,
- shelter entry/exit times and locations that are inconvenient or incompatible with people's daily routines,
- concerns about the security of personal belongings and difficulty moving belongings in and out of shelters daily,
- concerns about personal safety and exposure to germs and disease within shelters,
- specific barriers to entry, such as sobriety requirements and entry fees, and
- general perceptions of shelters as "inhospitable," "alienating," "demeaning," and offering little or no support or case management to find permanent housing.

Oakland, like other jurisdictions, experienced a significant increase in the number of encampments. The number of encampments and the number of residents occupying encampments changes frequently and is difficult to quantify. The Just Cities October 2018 Report⁹ identified 329 encampments in the City of Oakland. In comparison, the City's May 2019 master list of encampments identified 87 specific encampments and the City's master list of encampments in October 2020 included 140 encampments.

The City established a multi-department team in 2017

Like other cities, the City of Oakland established a multi-departmental team to coordinate its response to the numerous encampments throughout the City. The City's Encampment Management Team (EMT) was created in late spring of 2017. The goal of the team is to address issues arising from the increase in encampments and coordinate the City's response to managing encampments. The EMT was initially comprised of staff from the following departments and outside agencies: City Administrator's Office, Public Works, Human Services, Transportation, Police, Fire, Parks, Recreation and Youth Development, Alameda County Vector Control, and the Mayor's Office. On occasion, representatives from Bay Area Rapid Transit (BART), Caltrans, Alameda County's Homeless Response Team, and other agencies and City departments also participate.

Exhibit 5 below outlines City departments' and offices' encampment-related responsibilities and services. Information on the estimated costs for each of the departments and offices incurred on

⁹ Led by The Village, the East Oakland Collective, the Dellums Institute for Social Justice/Just Cities, the Goldman School of Public Policy's Rawan Elhalaby and Dr. Dan Lindheim, and the Housing and Dignity Project worked for almost a year to develop a community-based plan to house all of Oakland's unhoused residents. The report, *Housing Oakland's Unhoused*, can be found [here](#).

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encampment activities is provided in Section 3 and in the Appendix, which provides detailed cost information, descriptions of each of the department’s and office’s responsibilities on encampment activities, and the methodology used to estimate the cost incurred.

Exhibit 5: Departments’ and offices’ roles related to encampment activities

Departments and Offices	Encampment-Related Activities
Human Services Department (Human Services)	<ul style="list-style-type: none"> • Attends EMT meetings • Manages contracts for street outreach, including advance notification process of encampment interventions • Provides supplemental outreach at encampments • Manages contracts for health and hygiene interventions such as portable toilets, handwashing stations, water stations, and mobile showers at encampments • Provides direct and on-going outreach specifically to support encampments in managing hygiene interventions • Coordinates with the County on public health issues such as COVID impacts on encampment residents
Oakland Public Works (Public Works)	<ul style="list-style-type: none"> • Attends EMT meetings • Performs cleaning and clearing operations associated with various encampment interventions to protect the public right of way, remove debris, and store materials if needed • Performs garbage services at encampments • Manages hazardous waste removal contract
Oakland Police Department (Police Department)	<ul style="list-style-type: none"> • Attends EMT meetings • Participates in all interventions to create a safe working zone for City staff • Dispatches and responds to emergency calls at encampments • Traffic control • Tagging and towing abandoned vehicles
Oakland Fire Department (Fire Department)	<ul style="list-style-type: none"> • Attends EMT meetings • Performs inspections for fire hazards at encampments • Provides education on fire prevention • Provides staff during some interventions • Manages hazardous waste removal contract • Responds to fires at encampments • Responds to calls for medical emergencies at encampments
Department of Transportation (Transportation)	<ul style="list-style-type: none"> • Attends EMT meetings • Assesses and repairs electrical issues that occur at encampments such as illegal wire splices and wire thefts and resulting impairment of traffic signals and street lighting
Parks, Recreation and Youth Development	<ul style="list-style-type: none"> • Attends EMT meetings • Identifies and reports encampment-related issues at parks

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Departments and Offices	Encampment-Related Activities
City Attorney’s Office	<ul style="list-style-type: none"> • Attends EMT meetings • Advises all departments on matters related to homeless encampments, policies, services, and interventions • Defends City in lawsuits challenging encampment policies and practices • Represents City in state regulatory enforcement actions and interagency disputes (CalTrans/BART) • Advises on grant applications for state and federal funding • Drafts legislation, including Planning Code Amendments to authorize emergency shelters and RV parking; resolutions approving leases, grants, and appropriations • Reviews grants and Professional Services Agreements with homeless service providers • Negotiates and drafts contracts for the purchase, sale, and lease of real property for shelter operations • Advises Commission on Homelessness and City Council • Drafts legal opinions
City Administrator	<ul style="list-style-type: none"> • Sets agenda and leads EMT meetings • Coordinates the City’s cross-departmental and inter-agency homelessness response
Mayor’s Office	<ul style="list-style-type: none"> • Attends EMT meetings • Participates in other key local, regional, and statewide efforts • Participates in policy discussions related to encampment activities • Assists in building public-private partnerships to fund and evaluate efficacy of innovative homelessness interventions

The City established the Commission on Homelessness

The Commission on Homelessness (Commission), a citizen oversight body, was established in 2018 and seated in November 2020. This Commission oversees the revenue collected from the 2018 Measure W vacant parcel tax and the 2020 Measure Q parcel tax received by the City for homeless services. Measure W raises revenue for 1) homeless services, 2) preserves existing funding, 3) provides new funding for new affordable housing options, and 4) illegal dumping remediation. Measure Q provides funding for 1) the maintenance and improvement of City parks, landscape maintenance, and recreational facilities and services, 2) homeless services, and 3) the maintenance and cleaning of stormwater trash collection systems and reducing trash and litter in our parks, creeks, and waterways.

In addition, the Commission will make recommendations to the City Council for strategies to remedy homelessness, make budget recommendations on homelessness priorities to the Mayor and the City Council each biennial budget cycle, and review and respond annually to the City’s Encampment Management Policy and the PATH framework. They will also hear reports on the available housing, programs, and services for persons experiencing homelessness in the City including, but not limited to, street outreach, homeless shelters, transitional housing, housing exits, and permanent supportive

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housing as needed. The Commission is staffed by the Homeless Administrator and will meet at least four times a year. City Council appointed the Commissioners in November 2020 and their first meeting took place the following month.

Section 1

Impacts of Encampments and the City's Efforts to Mitigate Them

Finding: The impacts of encampments are far-reaching—affecting the City's housed and unhoused residents, City workers, City services, businesses, and the community

Summary

Encampments in Oakland have grown significantly, creating health and safety issues for the City's housed and unhoused residents. Encampments have also significantly impacted City staff, City services, businesses, and the community. In fiscal years 2018-19 and 2019-20, the City undertook approximately 500 closures, re-closures, and cleanings to manage the impacts of encampments. Additionally, the City provided nearly 1,600 garbage services and other hygiene services such as installing and maintaining showers and portable toilets. The EMT and the City were overwhelmed by the undertaking of closing and cleaning encampments because the City was not adequately prepared to undertake such a massive project. Specifically, the City lacked an effective strategy for dealing with the growth in encampments and did not provide sufficient policy direction or adequate funding at the onset of this crisis, and the EMT lacked sufficient resources, including a budget. The need to establish management systems to address these shortcomings is detailed in Section 4 of this report. We also identified several other areas for the City to enhance its intervention activities. These areas include the need for more complete data on encampment activities, increased outreach, improved notification and bag-and-tag processes, and the need for a clear and comprehensive policy on transporting encampment residents, in the event of a closure.

Encampments are unhealthy for the unsheltered and have significantly impacted City staff, City services, businesses, and the community

As noted in the introduction, the number of encampments in Oakland has grown significantly over the last several years. The encampments have had significant impacts on the residents of encampments, City staff, City services, businesses, and the community.

Encampments are unhealthy for its residents

In a 2018 report on adequate housing as a component of the right to an adequate standard of living, the United Nations General Assembly described treatment of encampments in Oakland and San Francisco as "cruel and inhumane." It reported that by discouraging informal encampments in the City, residents were denied access to water, sanitation, and health services.

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The unsheltered have endured significant impacts due to living in encampments. Moreover, many of the unsheltered are already more vulnerable to health and safety risks. These impacts are described below.

- **Unsanitary conditions** - Encampments lack clean water, accumulate large amounts of garbage, needles, human feces, rodents, and other vermin. Additionally, poor hygiene at encampments contribute to dental, skin, and other health problems, as well as diseases and illnesses. For example, in 2017, former Governor Brown declared a State of Emergency when a Hepatitis A outbreak in San Diego killed 20 homeless individuals and left hundreds sick. The City responded to the Hepatitis A outbreak in Southern California by increasing hygiene services, such as providing and keeping portable toilets clean, to avoid a similar outbreak in Oakland.
- **Dangerous living conditions** - Crimes including murders, sex trafficking, and drug use have become a significant problem in encampments. The City began tracking murders in encampments in 2020, and in calendar year 2020, 19 murders occurred at encampments, which represents 18 percent of all Oakland murders in 2020. Sex trafficking and forced labor is another significant problem at encampments. According to the National Alliance to End Homelessness, “Human trafficking exploits a person through force, fraud, or coercion for forced labor or commercial sex. Traffickers prey on the vulnerabilities of individuals in poverty, experiencing homelessness, or who are part of marginalized populations.” People are more susceptible to engaging in dangerous employment when they lack housing. It should be noted that individuals from outside of the unsheltered communities also contributed to the violence and illegal activities in and around the encampments.

- **Fires** - Fires are common and pose significant safety hazards. Encampment residents turn to wood stoves and camp fires for heat and cooking. These fires have the potential to become out of control and burn down camp structures and injure people, as shown by the photo on the right. Larger fires can spread to more populated areas and damage buildings and infrastructure, as



demonstrated by the recent loss of the Vietnamese American Community Center. In fiscal years 2018-19 and 2019-20, the Fire Department responded to 988 fire emergencies at encampments. In 2019, several homeless individuals moved into a boarded up vacant building that was previously damaged by a fire and started another fire. In 2020, an encampment resident died from a fire at an encampment.

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- **Vulnerable to health risks** - The homeless face barriers to accessing healthcare—leading to further health challenges. Strong evidence links homelessness with health issues such as mental illness, substance abuse, poor nutrition, skin conditions, diabetes, and higher exposure to weather-related incidents. Studies have shown high mortality rates among homeless people in general. For example, a 2019 report by the National Health Care for the Homeless Council stated that people who are homeless have higher rates of illness and die on average 12 years sooner than the general U.S. population. The COVID pandemic has only exacerbated the health risks to the homeless. People who are experiencing homelessness often have compromised immune systems and may be at elevated risk for viruses like COVID. They may be also at a higher risk of developing complications due to COVID, as they are more likely to have underlying chronic conditions compared to the general population.

Working at encampments has significantly impacted City staff

Not only do the conditions and risks at encampments affect encampment residents, but they also affect the work and well-being of City staff. City staff have encountered dangerous, stressful, and intense working environments within the encampments, leading to injuries and workers' compensation claims. Encampment activities have led to increased demand on public safety responses and legal actions against the City. Finally, City staff have had to forego their primary duties to work on encampment activities. The impacts of encampments on City staff are outlined below.

- **Traumatic experiences** - City staff reported trauma and obtained counseling services to help cope with the intense working environments at encampments. Verbal and physical confrontations are common when carrying out their duties.
- **Dangerous working conditions** - City staff were threatened on multiple occasions with weapons, such as guns, bottles, axes, and aggressive dogs when working at encampments. Further, staff have stepped on needles, handled human waste, and were exposed to COVID.
- **Other safety risks** - The Fire Department also reported that firefighters have been exposed to serious safety risks while fighting fires along railroad lines, where encampments are often located. The Fire Department has needed to contact the railroad companies to close the railroad lines during these fires. Delays in the railroad companies' responses to these requests have caused dangerously close calls for firefighters with approaching trains. Even though no injuries to firefighters have occurred, the Fire Department has lost firehoses, nozzles, and



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other equipment during these incidents. The above photo shows an encampment fire on East 12th Street, located along the BART tracks.

Because of these traumatic and dangerous working conditions, City staff have filed multiple workers' compensation claims due to mental stress or physical injury. In FY 2018-19, City staff filed four workers' compensation claims and another 22 claims in FY 2019-20. These claims were related to City staff working with the homeless population. For example, in 2019, a City employee filed a workers' compensation claim and received approximately \$19,000 to compensate the employee for mental stress while working with encampment residents, picking up human waste and needles, and experiencing harassment from City management. Most of the claims in 2020 were related to COVID exposures.

Encampments have impacted City services

Encampments have also impacted City services as described below.

- **Increased demand for public safety responses** - In fiscal years 2018-19 and 2019-20, the Police Department responded to 1,459 calls at encampments. As noted above, homicides at encampments represented 18 percent of all homicides occurring citywide in 2020. Additionally, the Fire Department responded to 988 fire emergencies at encampments in the same period. In some instances, the fires were significant and required responses with multiple fire engines and trucks. In some instances, the Fire Department has been challenged to extinguish fires due to the lack of fire hydrants near encampment locations. As a result, the Fire Department has needed additional engines to provide water to extinguish the fires.
- **Increased demand for service requests** - In calendar years 2018 and 2019, the 311 Call Center received a total of 1,152 complaints about encampments.
- **Legal actions filed against the City** - In 2018, the Ninth Circuit Court of Appeals issued a landmark ruling in *Martin v. Boise*, finding that Boise's enforcement of a "no camping" ordinance against homeless individuals violated the Eighth Amendment's prohibition against cruel and unusual punishment. Since the *Martin* ruling, seven lawsuits have been filed against the City challenging its homeless encampment management policies, practices, and procedures as unconstitutional. Each of the seven lawsuits alleges, among other claims, that the City has violated the constitutional civil rights of homeless individuals in violation of the Fourth, Eighth, and Fourteenth Amendments.¹⁰

In addition, in October 2020, the San Francisco Bay Conservation and Development Commission (BCDC) issued a cease and desist order demanding that the City remove all encampments at Union Point Park

¹⁰ The Fourth Amendment prohibits unreasonable searches and seizures and requires a search warrant supported by probable cause. The Eighth Amendment is a prohibition of cruel and unusual punishment that directly forbids communities from criminalizing certain aspects of homelessness. The Fourteenth Amendment guarantees all citizens equal protection under the laws.

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due to deteriorating conditions at several park sites located along the shoreline as a result of destructive encampment activities, or face penalties in the amount up to \$6,000 per day.

Homeless encampments have had significant impacts on Oakland businesses

As described below, homeless encampments have had significant impact on businesses in Oakland.

- **Impacts on clients/customers and staff** - Kaiser Permanente (Kaiser) reported their patients, as well as staff, were affected by the nearby encampment at Mosswood Park. For example, the smoke from open fires at the encampment permeated the hospital buildings, affecting patients and staff. This was especially concerning as vulnerable patients sought medical attention in these buildings. In fact, Kaiser Pediatrics is directly adjacent to the encampment. In a collaborative effort with Operation Dignity and the City of Oakland, Kaiser donated \$1 million to provide housing and support services for 50 people living at the encampment and relocated encampment residents to nearby hotels and other supportive housing.

A large encampment located at the Home Depot store near the Fruitvale neighborhood also experienced significant impacts to its customers and employees. During a cleaning of this encampment in November 2019, the City removed more than 250 tons (75 truckloads) of debris and garbage. In another incident, a man living in his RV brandished a pistol threatening two employees. In response to this and other incidents, Home Depot hired additional security and lobbied City officials to clean up and relocate the encampment. The encampment was closed in January 2020 and some residents were relocated to a Safe RV site that opened across the street.

The Oakland Marina tenants near Union Point Park are also impacted by encampments. Given the break-ins of the bathroom facilities, which tenants use to access showers, and threats of physical violence, it is difficult to rent boat slips at this marina.

Other businesses have reported stolen and abandoned vehicles left on the street for several months. In some cases, there are individuals residing in the vehicles. Further, this takes up needed parking spaces and blocks entrances.

- **Damage to property** - Business have reported being broken into. For example, at an Oakland marina, private bathrooms have been broken into, resulting in significant repair costs.
- **Safety concerns** - This includes harassment, blocked entryways, drug use, discarded hypodermic needles, prostitution, and more.

Encampments have significantly impacted the community

Encampments have also had significant impacts on the community. Some of these impacts include destroying or compromising City assets, environmental damage, and affecting public right-of-way and traffic, resulting in significant repair costs.

- **Destroyed or compromised City parks** - Residents in an encampment near Lake Merritt caused damage to the restored tidal marsh along the Lake Merritt channel in Peralta Park. This park

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renovation was part of the 10th Street Lake Merritt Channel widening project completed in 2018, at a cost of \$21 million. State and federal permits required the restoration as part of the overall project and required the City to maintain the parks in compliance with the permit criteria. The park now has extensive damage and the water quality of the channel has been compromised due to an encampment near the park. These damages include damaged park vegetation, broken irrigation lines, and ruined fencing. Encampment residents also urinated and defecated in the marsh. To repair the damage, the City will need to fence off the area, replace the soil, put in trees and plants, and repair the irrigation system. The City projects these repairs will cost an estimated \$550,000.

Another park, Union Point Park, is one of the most heavily impacted parks by homeless encampments. The San Francisco Bay Conservation and Development Commission (BCDC) has received numerous complaints from residents about conditions at the park that rendered the park unusable. In November 2019, BCDC staff observed numerous tents, vehicles, and other evidence of people living in the area and throughout the park. BCDC staff observed substantial amounts of dead or overgrown vegetation, numerous piles of debris, substantial graffiti, and poorly maintained restrooms, barbecues, and benches. BCDC staff also reported that numerous benches had been burned to the ground, and other instances of poor maintenance. Furthermore, BCDC staff found numerous public access amenities were missing, including a bicycle rack, public and Bay Trail signs, and several picnic tables. Staff were unable to access missing amenities and improvements, due to the presence of encampments, which prevented access to many portions of the park. Finally, BCDC staff reported that the park was unusable by the public for safe walking, picnicking, or other uses. The City performed a preliminary assessment of damage and estimated the repair cost for the lighting alone to be \$500,000. This does not include additional costs to repair bathrooms, landscaping, benches, and other damaged amenities. Due to the extent of the damage, the scope of the repairs exceeds existing contract capacities and vendor capabilities. These repairs will need to be addressed through the Capital Improvement Program, with corresponding procurement timelines and City Council approval of capital expenditures.

- **Illegal dumping** - Illegal dumping in and around encampments poses significant health and safety hazards to the encampment residents and the community. Illegal dumping refers to the willful, intentional, or negligent depositing, dropping, dumping, placing or throwing of any waste matter onto public property that is not expressly designated for disposal of waste matter. The City has received multiple complaints from residents, businesses, and City staff related to excessive garbage and litter associated with encampments. The complaints cited inaccessible roads and parks, overflowing garbage cans and garbage in waterways, needles on the ground, vermin, and more. One complaint of the illegal dumping of debris and appliances noted a person was “shooting up” drugs, while rats crawled around his feet. Additionally, the City re-allocated its Keep Oakland Clean and Beautiful (KOCB) Public Works’ staff and resources, which are normally dedicated to removing illegal dumping throughout the city, to spend 80 percent of their time performing interventions at encampments. Below are examples of illegal dumping in two City parks—Union Point Park and Mosswood Park.

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- **Water quality** - Encampments have caused environmental issues for the community. For instance, some encampments or RV's parked on City streets disposed of hazardous and human waste into the storm drain system, which flows to San Francisco Bay, potentially contaminating the Bay. Moreover, the Regional Water Quality Board, which regulates discharges to the Bay, is including a new provision in its latest administrative draft of Oakland's discharge permit to address such problems associated with homelessness. Additionally, as mentioned above, human waste was also found in the Lake Merritt channel, compromising water quality.
- **Public rights-of-way and traffic signals have been affected** - Encampments that spill out onto sidewalks and streets block public rights of way and violate the Americans with Disabilities Act. The blockages hinder school walking routes and neighborhood access to grocery stores and other commercial areas. The encampments may also hinder the ability of children to walk to school safely. For instance, encampments on 29th and 30th Streets in West Oakland were blocking both sides of the sidewalk under the freeway in a residential neighborhood.

Encampment residents have also illegally tapped into the Pacific Gas and Electric Company (PG&E) power connections through the City's utility boxes, electrical cabinets, and/or street light and traffic signal poles. This illegal tapping results in safety issues for drivers, pedestrians, and others by turning off traffic signals and street lighting. In addition, the City could risk liability if such events cause vehicular accidents and increased street crime due to the lack of adequate street lighting. The picture to the right is an example of electrical damage caused by encampment residents.



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- **Other public infrastructure has been damaged or compromised** - Encampment residents have also damaged other infrastructure. For example, in January 2019 and again in August 2020, encampment fires occurred in the same area under the BART tracks in East Oakland. Train service was halted in both directions due to these fires as transit officials surveyed the tracks for damage. Thick smoke from the 2019 fire caused visibility issues and a track support pillar was damaged. In addition, the Fire Department reported that one individual living under the BART tracks had one tent, around 80 bikes, tarps, lumber, and rubber tires at their encampment. The Fire Department reported that if the rubber tires had caught on fire, the BART tracks would have been destroyed.

Several encampment residents have resorted to opening fire hydrants, as a result of not having access to a clean water supply. Without specialized tools to open the hydrants, the fasteners on the hydrants can become stripped. Stripping the fasteners can make the hydrants difficult or impossible for firefighters to operate when needed. The improper use of hydrants can potentially cause other issues such as backflow contamination in the water system. In response, the East Bay Municipal Utility District has placed security locks on some hydrants, but some of the security locks have been removed. Additionally, nearby water lines have been tapped.

The Encampment Management Team was established to coordinate the City's response to the growing number of encampments

The EMT was created as an ad hoc multi-departmental team to coordinate the City's response to the growing number of encampments throughout the City. Accordingly, the City Administrator assigned an Assistant to the City Administrator to lead the team in developing and implementing the City's Encampment Policy. In 2020, the City Administrator appointed a Homeless Administrator to lead the Encampment Management Team. As noted earlier, the team included staff from the City Administrator's Office, Public Works, Human Services, the Police Department, the Fire Department, Transportation, Parks, Recreation and Youth Development, Mayor's Office, and City Attorney's Office on an as needed basis.

In 2017, the EMT developed the Encampment Management Policy (Policy) as one part of the City's strategy to address homelessness in Oakland. The Policy addressed the physical management of homeless encampments and established criteria for determining the various types of interventions to undertake at encampments. The criteria determining the level of intervention includes: health, safety, location, and size. Within each of the criteria are several factors that the EMT weighs in its decision-making process. The interventions include

- Closure – removing the encampment,
- Enforcement of closure – when homeless individuals return to a previously closed encampment, the City performs an intervention to prevent re-encampment. The 2017 Policy refers to this intervention as an enforcement of closure; however, this report will use the term “re-closure” to refer to this type of intervention,
- Cleaning – temporarily moving an encampment so that health and hygiene issues can be addressed and allowing the encampment to return, and

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- Hygiene and garbage services – providing portable toilets, hand-washing stations, regular garbage service, and/or traffic barriers to protect the health and safety of those in an encampment.

Prior to COVID, the EMT met every other week to make decisions related to encampment interventions. The EMT identified encampments for interventions primarily based on complaints received through the Oakland Call Center (Oak 311) and from complaints or observations from City staff.

The City conducted nearly 2,100 interventions in FY 2018-19 and 2019-20

In fiscal years 2018-19 and 2019-20, the City conducted nearly 2,100 interventions at encampments. These interventions included a total of approximately 500 closures, re-closures, and cleanings. Additionally, the City provided nearly 1,600 garbage services and other hygiene services such as installing and maintaining showers and portable toilets. The totals for FY 2019-20 are only for the first eight months of the fiscal year because the City suspended most closures, re-closures, and cleanings interventions at the beginning of the COVID pandemic as recommended by the federal Center for Disease Control and Prevention, state, and local guidelines.

Exhibit 6 below breaks down the number of interventions by type for fiscal years 2018-19 and 2019-20. Each intervention type such as a closure, re-closure, cleaning, and hygiene/garbage services counts as one intervention per encampment. For example, some encampments receive weekly garbage services and each pick-up is counted as one intervention.

Exhibit 6: Encampment interventions by type in fiscal years 2018-19 and 2019-20

Type of Intervention	Encampment Interventions FY 2018-19	Encampment Interventions FY 2019-20 (reflects 8 months)	Total Interventions
Closure	38	20	58
Re-Closure	56	67	123
Cleaning	224	74	298
Subtotal of Closures, Re-Closures, and Cleanings	318	161	479
Hygiene and Garbage Services*	797	802	1,599
Total Number of Encampment Interventions	1,115	963	2,088

Source: Chart created by auditors based on data provided by Oakland Public Works

*Not all encampments that receive portable toilets and hand-washing stations receive garbage service.

As Exhibit 6 above shows, the City reduced the number of closures and cleanings in FY 2019-20 compared to the previous fiscal year and increased the number of re-closures. On the other hand, the

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City provided more hygiene and garbage services in the first eight months of FY 2019-20 than in the prior 12 months.

In March 2020, the City suspended its encampment policy and enacted a temporary policy in response to the COVID pandemic, which accounts for some of the changes in the number of interventions. The City stopped closing encampments, significantly reduced the number of cleanings, and increased the number of encampments receiving hygiene and garbage services. The number of encampment sites receiving hygiene interventions was increased from 20 to 40.

The City's temporary policy included

- immediate suspension of the Encampment Management Policy and the Standard Operating Procedure and the implementation of a Temporary Encampment Management Policy effective March 2020,
- suspension of ordinary closures and ordinary cleaning interventions,
- suspension of towing, including oversized vehicles, and
- immediate intensive outreach to identify vulnerable unsheltered residents to relocate them to hotels and trailers.

The City's approach was consistent with relevant federal, state, and local legal and policy mandates or guidelines issued in response to COVID.

The challenges of addressing the growing number of encampments

The challenges of addressing the growing number of encampments and the City's efforts to address the conditions at encampments overwhelmed the EMT and the City. The following factors severely hampered the City's efforts to address the conditions at encampments throughout the City:

- The City lacks sufficient housing alternatives to house the unsheltered population.
- Offers of shelter beds are often declined because the shelters may not meet personal needs, such as restrictions for allowing pets.
- Closed encampments are often re-populated because many residents do not want to be displaced or relocated.
- Encampment residents complained, and even threatened City staff, about being displaced from encampments.
- Legal actions were filed against the City to stop its intervention efforts. As noted earlier, the City had seven lawsuits filed against it related to encampments and interventions.
- Encampment residents and their advocates protested at City Hall and at scheduled encampment closures to stop the City's intervention efforts.
- Residents and businesses complained about the growing number of encampments springing up in their neighborhoods and business districts.
- City staff were traumatized and burned-out because of the intense environment in which they worked.

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The City's efforts were also hampered by the lack of adequate resources and planning to carry out this massive undertaking. Specifically, we noted

- The City lacked an effective strategy for dealing with the growth in encampments.
- The City did not provide sufficient policy direction early on, including adequate funding.
- The EMT lacked sufficient resources to address the growing number of encampments and the City did not budget for the City's intervention activities.
- The EMT's collective decision-making was hampered because it lacked clear authority to make decisions on interventions. EMT members assigned to the team could not always attend the meetings or did not have the authority to commit resources to planned interventions. For instance, if department directors did not attend the meetings, they needed to be consulted at a later date to commit their departments' resources. Other members of the team, such as the Police Department's staff, did not have the authority to commit resources to conduct additional same day interventions. As a result, scheduling of interventions was more difficult, and delays were encountered.
- City staff were not adequately trained on crisis management and dealing with traumatized encampment residents.

These management issues and other management systems needed to improve the City's encampment management activities are addressed in Section 4.

The City's intervention efforts are constrained by recent legal decisions

The City's encampment-related actions are constrained by the ruling in the 2018 Ninth Circuit Court of Appeals case of *Martin v. Boise*. In *Martin*, the Court found that Boise's enforcement of a "no camping" ordinance against homeless individuals violated the Eighth Amendment's prohibition against cruel and unusual punishment. Since that ruling, seven lawsuits have been filed against the City challenging its homeless encampment management policies, practices, and procedures. Each of the seven lawsuits alleges, among other claims, that the City violated the constitutional civil rights of homeless individuals in violation of the Fourth, Eighth, and Fourteenth Amendments.

The Fourth and Fourteenth Amendment claims allege that the City improperly seized and destroyed property, and that other due process violations occurred during encampment cleaning and closure operations. However, the property collection and storage procedures in the City's Standard Operating Procedure (SOP) have been reviewed in the course of the litigation and, based on the preliminary proceedings, the SOP does not violate the Fourth or Fourteenth Amendments. The SOP requires legally sufficient notice before property is collected and allows property to be retrieved after storage.

The Eighth Amendment claims allege that the City is "criminalizing" the "status" of being homeless. In *Martin*, the Ninth Circuit explained that, "as long as there is no option of sleeping indoors, the government cannot criminalize indigent, homeless people for sleeping outdoors, on public property, on the false premise they had a choice in the matter." *Martin* prohibits punishing or criminalizing an involuntary act or condition if it is an "unavoidable consequence" of the status of being homeless.

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Significantly, however, the ruling in *Martin* is narrow. The decision distinguishes individuals who have access to adequate shelter and recognizes a city's ability to regulate public conduct and that which takes place on its property, stating:

Naturally our holding does not cover individuals who do have access to adequate shelter, whether because they have the means to pay for it or because it is realistically available to them for free, but who choose not to use it. Nor do we suggest that a jurisdiction with insufficient shelter can never criminalize the act of sleeping outside at particular times or in particular locations might well be constitutionally permissible. So, too, might an ordinance barring the obstruction of public rights of way or the erection of certain structures.

The City does not issue citations or arrest individuals for violating local or state laws aimed at prohibiting sitting, lying, or sleeping in public. Instead, the Police Department is tasked with ensuring and maintaining a safe work zone for staff from Public Works who perform cleaning and clearing operations at encampments.

The City may have the authority to determine the "time and place" of certain activities or the use of its public property. Nonetheless, it is legally obligated to follow established due process legal precedent, the ruling in *Martin*, as well as its own homeless encampment management policies, procedures, and legislation.

Opportunities exist to enhance the City's encampment interventions

We also identified other opportunities to enhance the City's intervention efforts. These enhancements include

- improving the information on the schedule of interventions,
- documenting the criteria for determining which encampments receive garbage and hygiene services,
- enhancing outreach efforts and re-assessing the notification process for interventions, improving the bag-and-tag process, and
- developing a clear policy on transportation provided to residents at closures.

Encampment Management schedule of interventions needs improvement

The Encampment Management schedule, the City's main record of interventions, tracks encampment interventions including the location of encampments, date(s) of intervention, number of crews used, and the types and conditions of encampments. However, this schedule does not adequately capture the types of interventions, the rationale for the intervention, the date of the intervention, the number of staff needed for the intervention, and the number of hours needed to complete the intervention. This information should provide a more accurate and comprehensive record of the City's encampment intervention activities. It could also provide a basis for planning future interventions.

The City's information on the schedule was incomplete. For instance, the schedule did not include the following information:

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- Not all interventions were recorded on the schedule. The EMT schedule was missing days/weeks of scheduled interventions that had occurred. This makes it difficult for the City to accurately track the number and location of encampment interventions.
- The City did not adequately document the reason for applying an intervention at a specific encampment. The policy requires encampment interventions consider safety, health, location, and size when determining which intervention to apply, but the actual justifications for the interventions were not recorded.
- The description of the type of intervention was not consistent. One column identifies the type of intervention, but because there is no standard for inputting data, it showed numerous variations of the same intervention. Having uniform naming conventions of interventions would improve documentation on the number and types of interventions.
- The schedule did not reflect when an intervention was postponed or cancelled, nor did the schedule accurately reflect when the intervention occurred. The schedule should indicate when an intervention was scheduled and whether the intervention took place on that day.
- The number of staff and hours spent at an intervention were not documented. The resources spent on interventions was not documented on the schedule.

The City needs to improve controls for data collection activities associated with encampment activities. The EMT meets regularly to share information and coordinate activities, however, regular communication did not necessarily translate to quality record-keeping as described in the section above.

Much of what is known about encampments takes the form of institutional knowledge, which could present challenges when organizational changes such as staff turnover occur.

Establishing controls around collected data provides assurance that the data is comprehensive, accurate, consistent, and ultimately reliable, so that the City can make data-driven decisions regarding encampment management.

The City needs to develop formal criteria for determining which encampments receive garbage and hygiene services

The EMT determines which encampments receive various services such as garbage services, portable toilets, handwashing stations, and other hygiene services. The City currently provides garbage services and hygiene services to approximately 40 encampments.

The City, however, does not provide these services to all encampments. Although the City increased these services to encampments, the criteria on which encampments receive these services is not written and the decisions reached are not documented. To ensure equitable service, the City should develop written criteria to determine which encampments should receive these services and then document which encampments receive these services based on these criteria.

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The City should enhance its outreach efforts and should reassess how it notifies encampment residents of impending interventions

A critical piece of carrying out an encampment intervention is the outreach to homeless individuals prior to the intervention. The City contracts with a nonprofit, Operation Dignity, to provide homeless outreach services at encampments. Human Services staff provide supplemental outreach services as needed. Outreach is a process designed to seek out and offer basic services to homeless individuals who might otherwise be overlooked or underserved. Effective outreach requires building trust and rapport, ensuring that people's basic needs are met, and supporting them along pathways toward housing stability.

Currently, outreach services include, but are not limited to, providing hygiene services to encampments, notifying residents prior to interventions, offering alternative shelter, providing harm reduction supplies,¹¹ facilitating reunification with family and friends, and more. Due to COVID, the audit was unable to make a comprehensive assessment of outreach services at encampments, but did identify the following observations:

- In several instances, the City extensively documented outreach at specific encampment closures such as identifying the number of encampment residents and the conditions at the encampment. The City, however, did not consistently document this information. Collecting data around the outreach provided, including the level of acceptance of services and alternative shelter offered, allows the City to analyze this information and adapt outreach strategies if needed.
- Encampment outreach is not sufficiently addressed in the 2017 or the 2020 EMT policy, other than to address the outreach related to the notification process. Specific outreach strategies should be established, and the results should be periodically reported to relevant stakeholders.
- The outreach strategy should include
 - establishing specific outreach goals,
 - defining and expanding roles and responsibilities for all stakeholders involved, including City staff and contracted outreach service providers,
 - ensuring adequate funding, and
 - implementing monitoring and reporting protocols, to ensure internal and external stakeholders can track the effectiveness of outreach strategies.

Prior to closures and cleaning interventions, the EMT policy requires the City to notify encampment residents no less than 72 hours ahead of interventions. For closures, the City is also required to post signage in multiple languages. Human Services manages the notification and outreach process through a third-party contractor, Operation Dignity, that notifies encampment residents no less than 72 hours in advance of closures and cleanings.

¹¹ These include food, hygiene kits, and blankets.

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Operation Dignity provides Human Services staff with photos of the posted notifications to document the notifications were posted (see example to the left). The audit selected a random sample of 11 encampment interventions to verify Operation Dignity posted the proper notification no less than 72 hours in advance of the intervention, as required by the City’s policy. City staff provided documentation from Operation Dignity that the notifications were posted for all 11 interventions tested.

Encampment residents, however, have voiced concerns that notifications are not regularly posted or viewed before an intervention, and some residents were unprepared on the day of an intervention.

As the picture to the right indicates, the audit team witnessed notifications ripped off and discarded,

potentially before encampment residents had seen them. Further, Operation Dignity staff may conduct an encampment visit at a time when few residents are present, and in these cases, some unsheltered residents may first encounter Operation Dignity staff on the day of an intervention.

These observations suggest that the notification process, even when followed, is not effective because the City cannot provide adequate assurance that encampment residents were properly notified of impending interventions.

Based on a limited sample of interventions, it appears the City complied with its notification process, however, the City should re-assess this process. Requiring encampment residents to relocate, even for a short period of time, can be very traumatic, especially for those residents with special needs. Thus, the City should evaluate its method for notifying residents of pending interventions. In doing so, the City should reassess whether there should be multiple in-person notifications that include documenting contact with the residents. Such an approach, if implemented, should be evaluated for its cost effectiveness, given increased in-person notifications and documentation will require more staff resources.



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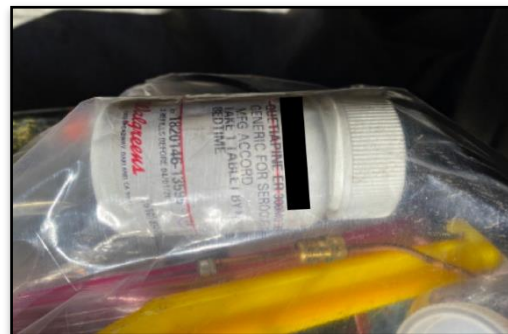
The bag-and-tag process could be improved

During encampment closures and re-closures, the City’s Standard Operating Procedure (SOP) requires Public Works staff to dispose of items that are clearly garbage or unsafe for storage. All other personal belongings left at a site are to be collected, labeled, and stored (a process called bag-and-tag) in the Public Works warehouse for at least 90 days. Public Works staff are required to fill out an itemization form detailing the belongings collected with the location, date, and time of collection. A ‘Notice of Collected Property’ is posted at the site, which includes the Public Works Call Center phone number so that the encampment resident can reclaim their property.

According to City staff, encampment residents are encouraged to keep their belongings with them. Thus, the bag-and-tag process is not often used. When the process is used, however, the City’s procedures were not strictly followed as the audit found the following discrepancies:

- **Perishable items** - The SOP states that Public Works staff should dispose of belongings that are clearly garbage or are unsafe for storage, such as food or food wrappers, soiled items, or used personal hygiene items. Auditors observed perishable items, including string cheese, being stored.

- **Controlled substances** - The SOP states that all medications and controlled substances will be turned over to the Police Department. However, auditors observed a container of anti-psychotic medication being stored, as shown to the right.



- **Lack of labels/itemization** - The SOP states that Public Works staff will collect, bag, and label personal belongings left at the site and itemize belongings collected. The labeling should include the location, date, and time of collection on the itemization form. Auditors observed that all items collected were not labeled as required. As a result, it is difficult to ensure belongings are returned to their owner.

- **Unorganized storage** - Auditors observed roughly 30 unlabeled bicycles (including parts and tires) stacked on top of each other, as shown to the right. The department would benefit from a system of organization and documentation of items.



- **90-day storage** - The SOP states that collected belongings will be stored at a Public Works Department facility for at least ninety (90) days. We observed a lack of organization and labeling of items, suggesting that following guidelines for storage time is likely difficult to

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follow. Without an organizational structure, the City may also expose itself to additional risk associated with the potential for items to be misplaced or stolen.

Other jurisdictions have articulated a similar need to improve the storage options of personal belongings for unsheltered individuals. For instance, the City of Los Angeles recommends offering subsidized transportation to storage facilities. While this option would certainly remove existing barriers that may currently discourage encampment residents from utilizing storage options, Public Works currently stores possessions in a single shipping container, unfit to accommodate many additional items. Los Angeles also recommends increasing access to neighborhood-based storage facilities in close proximity to encampments by operating on City-owned property or offering vouchers to private storage facilities and establishing storage limits. A similar approach could allow the City of Oakland to reduce barriers to encampment residents accessing their property.

The City needs to develop a clear, comprehensive policy for transportation assistance

The City should develop a clear, comprehensive policy for transportation assistance following a closure or a re-closure. Currently, Operation Dignity is contracted to provide unsheltered individuals with transportation assistance in the form of bus tickets, cab vouchers, agency vehicles with staff, and/or companion public transportation, but only when the individual is being connected with benefits or services with a designated destination prior to closure. Encampment residents, who have not been offered shelter, denied shelter options, are waiting to enter Community Cabins or Safe RV sites, or want to relocate to another encampment rely on volunteers unaffiliated with the City to help coordinate their transportation. Occasionally, City staff offer stranded encampment residents transportation assistance to shelter options or other locations. Informal transportation agreements between encampment residents and City staff or volunteers demonstrate a gap in policy. The City should reassess its contractual agreement with Operation Dignity or otherwise ensure that transportation needs are met when City actions result in the displacement of encampment residents.

Conclusion

Encampments in Oakland have grown significantly creating health and safety issues for the City's housed and unhoused residents. Encampments have also significantly impacted City staff, City services, businesses, and the community. In fiscal years 2018-19 and 2019-20, the City undertook nearly 2,100 interventions to manage the impacts of encampments. These interventions at encampments included approximately 500 closures, re-closures, and cleanings, and approximately 1,600 garbage services, and other hygiene services. The EMT and the City were overwhelmed by the undertaking of closing and cleaning encampments because the City was not adequately prepared to undertake such a massive project. Specifically, the City lacked an effective strategy for dealing with the growth in encampments and did not provide sufficient policy direction or adequate funding at the onset of this crisis, and the EMT did not have resources, including a budget. The need to establish management systems to address these shortcomings is in Section 4 of this report. We also identified several other areas for the City to address, in order to enhance its intervention activities. These areas include the need for more complete

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data on encampment activities, increased outreach, improved notification and bag-and-tag processes, and a clear, comprehensive policy on transporting residents, in the event of a closure.

Recommendations

To enhance its encampment intervention activities, the City Administration should

1. Implement an organizational structure for the EMT that includes defined roles, responsibilities and authority, including a clearly defined decision-making process.
2. Modify its encampment schedules to better document the types of interventions, the rationale for the intervention, the date of the intervention, the number of staff needed for the intervention, and the number of hours needed to complete the intervention.
3. Work with the EMT to develop a more user-friendly system for tracking encampment activities. This system should include drop-down menus to provide uniform naming conventions, as well as stronger controls to ensure that information on encampment activities are complete and consistently documented.
4. Establish written criteria for determining which encampments should receive garbage services, portable toilets, and other hygiene services, and document which encampments are to receive these services based on these criteria.
5. Modify the Encampment Management Policy to address outreach strategies prior to interventions. The outreach strategies should include
 - establishing specific outreach goals,
 - defining and expanding roles and responsibilities for all stakeholders involved, including City staff and contracted service providers,
 - ensuring adequate funding, and
 - implementing monitoring and reporting protocols to ensure internal and external stakeholders can track the effectiveness of outreach strategies.
6. Develop policies and procedures to document the City's outreach efforts at encampments, including the outreach provided, the acceptance of services, and the alternative shelter offered.
7. Evaluate other cities' methods for informing encampment residents of impending interventions so that encampment residents are adequately notified of scheduled interventions.
8. Take appropriate actions to ensure City staff comply with the Standard Operating Procedure for the bag-and-tag process.
9. Evaluate other cities' use of storage facilities to provide alternatives to the bag-and-tag process.
10. Develop a clear, comprehensive policy for transportation assistance following an encampment closure or re-closure. The City contracts should align with any policy changes.

Section 2

Police, Fire, and 311 Response Times

Finding: The Police Department’s response times to 911 emergency calls at encampments were not timely, but the Fire Department’s responses to fire emergencies at encampments were timely, and the response time to 311 service requests need further examination

Summary

In addition to providing interventions, the City also responds to emergency and service requests related to encampments. The Police Department responds to 911 emergency calls for services at encampments and the Fire Department responds to fire and medical emergencies at encampments. The 311 Call Center receives and responds to service requests at encampments.

The Police Department’s response time to emergency calls at encampments averaged four to six hours in fiscal years 2018-19 and 2019-20. The Police Department also needs more information to fully capture all police emergencies at encampments. The Fire Department responded to fire emergency calls at encampments in less than eight minutes in fiscal years 2018-19 and 2019-20. The Fire Department’s response times to medical emergencies could not be calculated because the Fire Dispatch Center does not distinguish these calls from other medical emergencies. The 311 Call Center’s average response time to service requests was 22 days in 2018 and 39 days in 2019.

The Police Department’s response to 911 emergency calls at encampments were not timely

The Police and Fire Communications Divisions are charged with handling police, fire, and medical-related calls. The Communications Divisions answer the calls and dispatches them to either the Police Department’s Patrol Divisions and/or the Fire Department.

Response time goals for police emergency calls

Calls for service that require a physical police response are categorized and dispatched by the 911 Call Center as Priorities 1, 2, and 3. The priorities are described below.

- **Priority 1 calls** are the highest priority and include situations where life or property is in imminent danger. These include crimes in progress such as robberies, rapes, assaults, or burglaries. These calls also include violent disturbances, reports of individuals with guns, or shots fired.

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- **Priority 2 calls** include situations that require an immediate response, with no immediate threat to life or property. These include family disputes, disturbance of the peace, and suspicious activities.
- **Priority 3 calls** include calls where there is no substantial threat to life or property, but a police response is needed. These include reports of crimes where a significant amount of time has elapsed since the occurrence of the crime. For example, someone comes home from work to find their home had been broken into several hours earlier.

According to a 2010 Oakland Police Department report, a reasonable standard for a priority 1 call is for no more than five minutes from the time the call is received at the 911 Call Center until a police officer is on scene. The report also noted that Priority 2 calls should be responded to within 10 to 15 minutes and Priority 3 calls should be responded to within 30 minutes.

To achieve these response times, the 2010 report stated that the Police Department would need at least 420 to 517 officers on patrol to achieve the response time goals. In 2009, the Police Department had 334 officers on patrol, or 86 to 183 fewer patrol officers than the report stated would be needed to achieve the response time goals. As of December 31, 2020, the Police Department had 248 officers actually working on patrol. Although the Police Department has not achieved staffing levels required to achieve the response time goals specified in the 2010 report, these ideal response times provide context for the Police Department’s response times at encampments.

The Police Department’s response to emergency calls at encampments were not timely

In FY 2018-19, the Police Communications Division dispatched 823 emergency calls to encampments. We were unable to analyze all these calls because response data was incomplete. Accordingly, we analyzed 572 calls in which the information was complete. Exhibit 7 below shows the priority of the calls, the range of response times, the average response time, and median response time for the 572 calls.

Exhibit 7: FY 2018-19 Police Department response time to 911 calls at encampments

Call Priority	Number of Calls	Response Time Range	Average Response Time	Median Response Time
1	1	25 minutes	25 minutes	25 minutes
2	568	0 - 54 hours	4 hours	2 hours
3	3	1– 13 hours	7 hours	7 hours
TOTAL CALLS	572			

Source: Dispatch data provided by the Police Department

As Exhibit 7 above shows, the Police Department’s response times to calls to encampments in FY 2018-19 were not timely. The overwhelming majority of the calls to encampments were Priority 2, which ideally should be responded to in 10 to 15 minutes. The Police Department, however, responded to

Audit Results

these calls in an average of 4 hours. The range of response times was 0 to 54 hours and the median response time was 2 hours.

Our review of the FY 2019-20 calls to encampments showed similar results. In FY 2019-20, the Communications Division dispatched 636 emergency calls to encampments. We analyzed 416 calls, of which, 415 calls were Priority 2, and 1 call was a Priority 3. Exhibit 8 below summarizes the Police Department's response times to the 416 calls.

Exhibit 8: FY 2019-20 Police Department's response times to 911 calls at encampments

Call Priority	Number of Calls	Response Time Range	Average Response Time	Median Response Time
1	0	N/A	N/A	N/A
2	415	0 – 153 hours	6 hours	3 hours
3	1	7 hours	7 hours	7 hours
TOTAL CALLS	416			

Source: Dispatch data provided by the Police Department

As Exhibit 8 above shows, the Police Department's response time to the 415 Priority 2 calls at encampments was slower than the previous year. The Police Department's response time for the Priority 2 calls averaged 6 hours, the median response time was approximately 3 hours, and response times ranged from 0 to 153 hours. For the one Priority 3 call, the Police Department responded in approximately 7 hours.

According to Police Department staff, the 911 emergency calls identified as encampment calls do not capture all encampment-related calls. In some instances, the Police Department's Patrol staff respond to emergencies near encampments that involve encampment residents. The Communications Division would be unable to classify these calls as encampment-related when the calls come in.

The Fire Department's response time to encampment fires were timelier than the Police Department's, but information is needed on medical emergencies

The Fire Department responds to fire incidents such as structure fires, fires at encampments, and other fires such as vehicle fires, vegetation fires, or other outside fires. The Fire Department's goal is to respond to 90 percent of fire calls within seven minutes. Exhibit 9 below shows the fire incident types and numbers for each incident type for fiscal years 2018-19 and 2019-20.

Exhibit 9: Fire Department's incident types and numbers for fiscal years 2018-19 and 2019-20

Fire Incident Types	FY 2018-19	FY 2019-20
Structures	901	907
Encampments	447	541
Other (Vehicle, Vegetation, Outside Fires)	2,192	2,896
Total	3,540	4,344

Source: Dispatch data provided by the Fire Department

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As Exhibit 9 above shows, the Fire Department responded to 447 fire calls at encampments, or 12.6 percent of all Fire Department calls, during FY 2018-19 and 541, or 12.5 percent of all Fire Department calls in FY 2019-20.

Exhibit 10 below shows the Fire Department’s response times to encampment fires in fiscal years 2018-19 and 2019-20.

Exhibit 10: Fire Department’s response time to encampment fires in fiscal years 2018-19 and 2019-20

	FY 2018-19	FY 2019-20
Total Response Time	7 minutes 53 seconds	7 minutes 54 seconds

Source: Response time data provided by Oakland Fire Department

As Exhibit 10 above shows, the Fire Department responded to 90 percent of its calls to encampments in 7 minutes and 53 seconds in FY 2018-19. In FY 2019-20, the Fire Department responded to 90 percent of calls to encampments in 7 minutes and 54 seconds. The Fire Department’s response times to encampment fires were consistent over the two years. In addition, the Fire Department’s responses to encampment fires were slightly better than its responses to all other fires in which the Fire Department responded to in both fiscal years. Specifically, in FY 2018-19, the Fire Department responded to 90 percent of all fires in 8 minutes and 6 seconds. Similarly, in FY 2019-20, the Fire Department responded to 90 percent of all fires in 8 minutes and 12 seconds.

We were unable to assess the response time for medical emergencies because the Fire Department currently does not track data for calls for medical emergencies at encampments.

311 Call Center response time data needs further examination

We also analyzed response times for 311 calls associated with encampment complaints. Residents contact the 311 Call Center to register complaints about various City activities, including complaints about encampments. As mentioned earlier, the Encampment Management Team uses the complaints received through the 311 system to assist in determining which encampments to perform interventions. Unlike the Police Department’s and Fire Department’s response times, the 311 response times are calculated from the time the complaint was received to when it was resolved or closed.

In calendar years 2018 and 2019, the Call Center received a total of 1,152 calls related to encampments, 627 calls in 2018 and another 525 calls in 2019. Exhibit 11 below shows the average response range, the average response time, and median response time. Our analysis included only calls that were closed. As noted above, the Call Center received 627 calls in 2018, but only 299 calls were formally closed. In 2019, 525 were received, but only 152 calls were closed. Additionally, the 311 calls we analyzed specifically identified encampments, but there likely were other calls for illegal dumping at or near encampments that may not have been identified as an encampment complaint.

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Exhibit 11: Response times to close 311 encampment service requests in calendar years 2018 and 2019

Category	Calendar Year 2018	Calendar Year 2019
Response Time Range	0 – 212 days	0 – 202 days
Average Response Time	22 days	39 days
Median Response Time	12 days	23 days
# of Closed Cases	299	152

Source: Analysis created by auditors based on Oak 311 service request data

As Exhibit 11 above shows, the response times ranged from less than 1 day to 212 days in 2018 and less than 1 day to 202 days in 2019. The average response time was 22 days in 2018 and 39 days in 2019. The median response time was 12 days in 2018 and 23 days in 2019.

Given the gravity of the homeless crisis, the response times are concerning, and the Administration should evaluate both the integrity of the data and the resolution of calls regarding encampments.

Conclusion

The Police Department responds to 911 emergency calls for services at encampments and the Fire Department responds to fire and medical emergencies at encampments. The Police Department’s response time averaged four to six hours in fiscal years 2018-19 and 2019-20. The Police Department needs more information reported to fully capture all police emergencies at encampments. The Fire Department responded to fire emergency calls at encampments in less than eight minutes in fiscal years 2018-19 and 2019-20. The Fire Department’s response times to medical emergencies cannot be calculated because the Fire Dispatch Center does not distinguish these calls from other medical emergencies. The response time for 311 calls related to encampments ranged from less than 1 day to 212 days in 2018 and 2019. These response times could be improved, and the corresponding data should be reviewed to ensure the integrity of the data and to determine if calls are being properly resolved and closed.

Recommendations

To capture all emergency calls to encampments, the Police Department should

11. Modify its call reports to identify when staff respond to encampment calls.

To more comprehensively identify emergency calls associated with encampments, the Fire Department should

12. Work with the records management software vendor and Fire Dispatch Center to establish a unique Incident Type that will allow the department to distinguish medical emergency calls at encampments from all other medical emergencies. Further, the Fire Department should ensure staff use the appropriate disposition code upon clearing the location.

Audit Results

To address the concerning 311 Call Center response times, the City Administration should

13. Evaluate both the integrity of the 311 Call Center data and the resolution of calls regarding encampments.

Section 3

City's Costs Associated with Encampment Activities

Finding: The City incurred approximately \$12.6 million in direct costs associated with encampment activities in fiscal years 2018-19 and 2019-20. Most of these costs were not budgeted and resulted in the City forgoing other services to redirect staff and resources to encampment activities

Summary

In fiscal years 2018-19 and 2019-20, we estimate multiple City departments and offices incurred approximately \$12.6 million in direct costs associated with encampment activities. The City currently does not have a comprehensive budget and formal systems in place to account for the costs associated with activities at encampments, including the time spent on interventions. Further, the City has not established a dedicated budget for encampment management activities, so departments are left to use their existing budgets and resources to address encampment activities.

The City does not budget and track costs for encampment management activities

The City does not possess a specific, programmatic budget that covers the full scope of the encampment management activities it performs. Some departments have limited dollars allocated for encampment-related services, while most do not, and fund encampment activities through their department budgets, thus prioritizing encampment management activities over other department obligations. As a result, the true cost of encampment management activities can become obscured within larger operational budgets, leaving the extent of these expenditures unknown.

The City currently does not have formal systems in place to account for the costs associated with activities at encampments. Therefore, we estimated the costs based on interviews with various department staff and obtained documentation, whenever possible, to estimate the City's costs associated with activities at encampments. Our estimate is not intended to be an exact accounting for all costs the City is currently incurring. Instead, it is an estimate based upon known costs and activities associated with encampments.

Audit Results

Multiple City departments and offices incurred approximately \$12.6 million in direct costs associated with encampment activities in fiscal years 2018-19 and 2019-20

Multiple City departments and offices perform a variety of activities associated with encampments located throughout the City. We estimate that the City incurred approximately **\$12.6 million** in direct costs associated with encampment activities in fiscal years 2018-19 and FY 2019-20. In FY 2018-19, we estimate the City incurred approximately \$5.5 million in direct costs and \$7.1 million in direct costs in FY 2019-20, an increase of 30 percent between the two fiscal years. The methodologies used to estimate these costs are shown in the Appendix. Exhibit 12 below provides an overview of the City's estimated costs on encampment-related activities in fiscal years 2018-19 and 2019-20.

Exhibit 12: Estimate of the direct costs the City incurred on encampment activities by departments and offices for fiscal years 2018-19 and 2019-20

Departments and Offices	FY 2018-19	FY 2019-20	2-Year Total	% Change
Public Works	\$ 1,569,000	\$ 1,652,000	\$ 3,221,000	5%
Police Department	\$ 1,469,000	\$ 1,628,000	\$ 3,097,000	11%
Human Services	\$ 811,000	\$ 1,333,000	\$ 2,144,000	64%
Fire Department	\$ 733,000	\$ 1,032,000	\$ 1,765,000	41%
City Attorney	\$ 415,000	\$ 822,000	\$ 1,237,000	98%
City Administrator	\$ 191,000	\$ 296,000	\$ 487,000	55%
Transportation	\$ 168,000	\$ 145,000	\$ 313,000	-14%
Parks, Recreation & Youth Development	\$ 88,000	\$ 116,000	\$ 204,000	32%
Mayor	\$ 12,000	\$ 74,000	\$ 86,000	517%
Total	\$ 5,456,000	\$ 7,098,000	\$ 12,554,000	30%

As Exhibit 12 above shows, the direct costs the City incurred increased from \$5.5 to \$7.1 million between fiscal years 2018-19 and 2019-20. This represents an increase of 30 percent from FY 2018-19 to FY 2019-20 for all departments and offices.

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Exhibit 13 shows the percentage of combined total costs incurred for encampments activities by departments and by offices for fiscal years 2018-19 and 2019-20.

Exhibit 13: Estimated percentage of combined total costs incurred by departments and offices for fiscal years 2018-19 and 2019-20

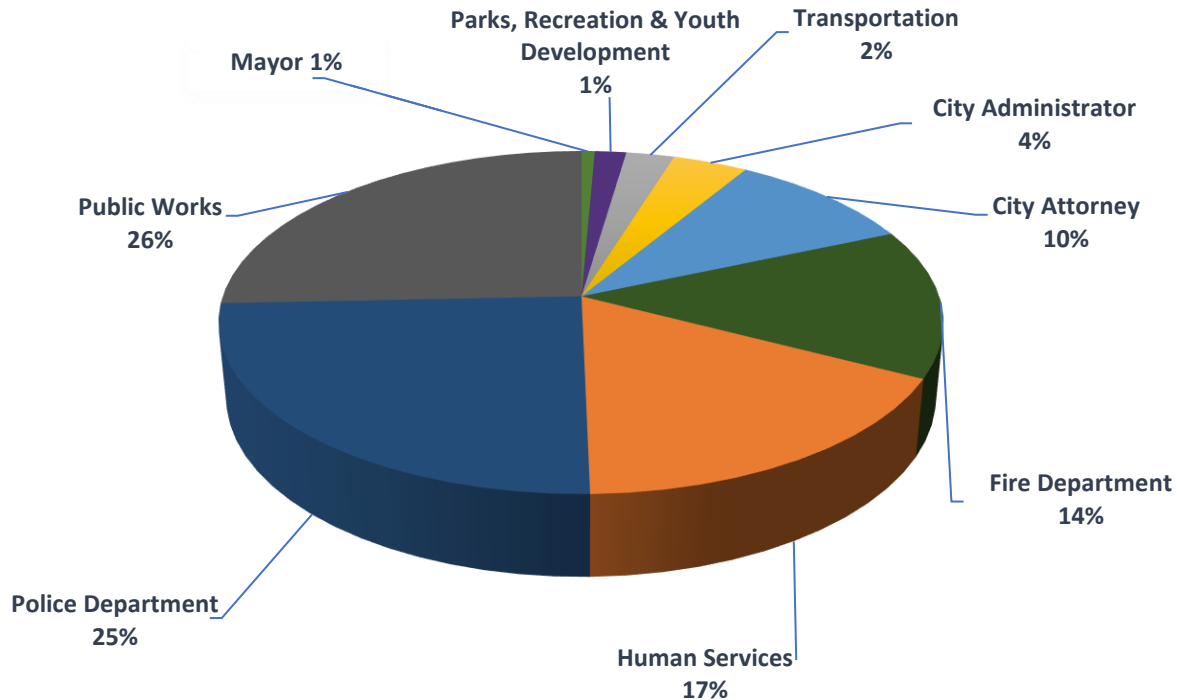


Exhibit 13 represents each department’s and office’s percentage of the combined total costs for both fiscal years 2018-19 and 2019-20. Public Works and the Police Department accounted for approximately 50 percent of the costs the City incurred on activities associated with encampments between fiscal years 2018-19 and 2019-20. Human Services and the Fire Department accounted for the next largest percentage of the costs with 31 percent of the total cost. The remaining 19 percent of the costs were split between Department of Transportation, Parks, Recreation and Youth Development, the City Administrator’s Office, the City Attorney’s Office, and the Mayor’s Office.

This analysis focuses on the City’s significant costs directly associated with encampment activities. As such, not all departments that provide services to the homeless population are included in this cost analysis. We did not include cost analyses for other departments that have been indirectly impacted by homelessness. For example, this analysis does not include the Oakland Public Library, which serves the unsheltered population with computers and literacy services.

Also, we did not include overhead costs in this analysis. Overhead costs refer to all indirect expenses of running a department or function in the City. For example, certain administrative functions like accounting, cash management, telephone expenses, and information technology. These costs can be difficult to allocate because the City uses predetermined overhead rates to recover costs from each department’s budget.

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We estimated the hourly cost of closures and cleanings to be \$1,464 per hour

We also calculated the hourly rate of a typical encampment intervention such as a closure or a cleaning. As shown on Exhibit 14, a typical encampment intervention deploys 12 staff and a total of 8 vehicles and pieces of equipment. We calculated the average hourly cost to be \$1,464 per hour. As Exhibit 14 shows, our estimate includes Public Works staff (one supervisor, four Maintenance Workers, three Street Maintenance Leaders, and one Heavy Equipment Operator), and Police Department staff (one Sergeant and two Officers). The estimate also includes the vehicles and equipment needed for a typical intervention. The estimate does not include the cost of the EMT to plan the interventions.

Exhibit 14: Hourly cost of intervention activities in FY 2019-20 and the list of staff, vehicles, and equipment used on interventions

Number of Staff	Number of Vehicles/Equipment ¹²
<p>Public Works (9)</p> <ul style="list-style-type: none"> Public Works Maintenance Workers (4) Street Maintenance Leaders (3) Heavy Equipment Operator (1) Public Works Supervisor (1) <p>Police Department (3)</p> <ul style="list-style-type: none"> Police Officers (2) Police Sergeant (1) <p>Total number of staff: 12</p>	<p>Public Works</p> <ul style="list-style-type: none"> 25-Cubic Yard Packers (2) Pickup Trucks (2) Lightning Loader (1) Front End Loader (1) Dingo (1) Trailer (1) <p>Total number of vehicles/equipment: 8</p>
Hourly Cost of Interventions: \$1,464	

Source: Prepared by auditors based on data from the City's financial reporting system and information from Public Works

According to City staff, the interventions can vary in time from several hours to several days. We were unable to estimate the cost of each intervention because the departments and offices involved with the interventions do not track the amount of time spent. To provide some perspective, however, an encampment intervention taking two hours would cost approximately \$3,000 and an intervention taking three days would cost approximately \$35,000.

We could not quantify the cost of a second crew, which is used on larger interventions, or days with multiple interventions

Sometimes, the City needs a second crew at encampment interventions due to the size or number of interventions planned for that day. The additional crew is typically made up of one Street Maintenance

¹² A 25-Cubic Yard Packer carries and compresses debris. Once the load is full, City staff dump the debris at the David Street Transfer Station (DSTS). This piece of equipment requires a commercial license to drive. The Lightning Loader and the Front-End Loader are used either to load debris on the vehicle itself or on other vehicles. City staff later dispose of the debris at the DSTS. Both loaders require a commercial license to drive. The Dingo is used to load debris onto the 25-cubic yard Packer.

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Leader, two Public Works Maintenance workers, and two Police Officers, as well as two additional pieces of equipment, which likely incurs significant costs.

However, we were unable to estimate costs associated with the additional crew for several reasons. First, prior to May 2019, Public Works neither tracked the instances when an additional crew was needed, nor the number of hours the additional staff spent at the operations. Second, the Police Department did not start tracking the same information until February 2020.

Until the City comprehensively tracks the hours associated with the second crew (i.e., Public Works staff and Police officers), the costs cannot be accurately calculated nor estimated.

In addition to incurring costs, encampment activities are diverting time and resources from primary City services

As Oakland's homelessness crisis grows, so does the cost for managing the encampments. City departments and offices had to prioritize encampment management at the expense of other City services.

City services that have been affected by the City's increased focus on encampments include

- **Illegal dumping** – the Keep Oakland Clean and Beautiful Division of Public Works used funding and staffing dedicated to illegal dumping services to carry out encampment interventions, leaving fewer staff to respond to illegal dumping complaints.
- **Residential and commercial fire inspections** – the Fire Prevention Bureau of the Fire Department inspects encampments for fire hazards and investigates causes of fires at encampments. Inspectors have less time to dedicate to residential and commercial fire inspections, thereby reducing the number of fire safety inspections conducted and revenue generated from these inspections.
- **Abandoned autos** – the Abandoned Auto Unit of the Police Department participates in some encampment interventions to tag and facilitate the towing of cars. As such, the Police Department faces a growing backlog of abandoned auto cases that are not encampment-related and are impacting neighborhoods.
- **Hazardous material disposal** – the volume of hazardous waste generated by encampments has imposed a burden on the Fire Department. Collecting, handling, recycling, treating, storing and disposing hazardous waste from encampments has significantly increased the department's costs dedicated to hazardous materials.
- **Street light and traffic signal maintenance** – the Department of Transportation is responsible for repairing illegal wire taps into the City's utility boxes, electrical cabinets, and street light and traffic signal poles at encampments. Additionally, when conducting repairs, they require support from the Police Department, the Fire Department, and Public Works for safety and assistance removing debris. These repairs pull staff from their primary responsibility of maintaining street lights and traffic signals.

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Conclusion

In fiscal years 2018-19 and 2019-20, we estimate multiple City departments and offices incurred approximately \$12.6 million in direct costs associated with encampment activities. The City currently does not have a comprehensive budget or formal systems in place to account for the costs associated with activities at encampments, including the time spent on interventions. Further, the City has not established a dedicated budget for encampment management activities, so departments are left to use their existing budgets and resources to address encampment activities. Recommendations for the need for a budget and cost tracking system have been incorporated into Section 4.

Recommendation

To provide the City with systems for tracking and monitoring costs associated with encampment activities, the City should

14. Document the amount of time spent, and staff needed, on encampment interventions such as closures, re-closures, cleanings, and hygiene services.

Section 4

Management Systems Needed to Effectively Implement the New Encampment Management Policy

Finding: The City needs to develop and implement formal management systems to effectively administer the new encampment policy

Summary

The City Council adopted a new encampment policy in October 2020, which was scheduled to take effect in January 2021. The new policy will significantly change how the City manages homeless encampments throughout the City. To effectively implement the policy, the City will need to take a more proactive, programmatic, and strategic approach in managing encampments throughout the City. Such an approach includes establishing a more formal structure more akin to how other programs are managed. This includes establishing goals, objectives, strategies, and annual workplans for achieving the City's vision, a budget for encampment management activities, assessing staffing roles and requirements, implementing written policies and procedures, better management information, and staff training.

The City Council adopted a new Encampment Management Policy in 2020

The City Council adopted a new encampment management policy in October 2020, which was scheduled to become effective in January 2021. The purpose of the policy is to protect and serve all Oaklanders – sheltered and unsheltered, by balancing the interests of residents. Key elements of the policy include

1. **Designating high-sensitivity areas**, where unmanaged encampments are presumed to cause unreasonable health and safety impacts due to the nature of the location. These areas are formally designated by the City Council and can include parks, protected waterways, and other public lands. In these locations, the City would prioritize maintaining the areas free of encampments. The City Council reserves the right to allow encampments in high-sensitivity areas; however, it is recommended that the operation and management of encampments in these areas be in collaboration with a managing agency such as a nonprofit organization, advocacy group, faith-based organizations, other public agency, or a grassroots collective. The managing agency would work in collaboration with encampment residents and the City to mitigate safety and health hazards. Encampments located within a high-sensitivity area that are

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not approved by the City Council will be subject to a closure intervention. Except when urgent health and safety concerns require shorter notice, encampment residents will be given no less than 72 hours to accept an offer of shelter or alternative housing, if such referrals are available. Individuals are also free to voluntarily relocate to a low-sensitivity area if shelter provisions are declined. All declinations will be documented.

2. **Designating low-sensitivity areas**, where enforcement will not be prioritized. These areas are to be monitored and managed by the EMT. These areas will have a set of standards that need to be followed and encampments that do not comply with the standards and with applicable and generally enforced state codes and local ordinances are subject to EMT intervention.
3. **Determining findings that will prompt EMT intervention.** The policy allows the EMT to consider public health findings and public safety findings to justify interventions at encampments. Potential public health findings include but are not limited to: confirmed cases of infectious diseases, confirmed exposures to infectious diseases, and excessive animal or vector hazards, such as rats and other vermin. The public safety findings include but are not limited to: the location of the encampment impedes traffic or the right-of-way, excessive fire hazards, and excessive amounts of waste, debris, and garbage. The interventions to address these findings of public health or safety include: hygiene and garbage services, deep cleaning, partial closures, and closures. Additionally, the policy provides guidance on proper noticing prior to any encampment intervention. The policy also addresses the storage of individuals' property, in the event of an intervention.
4. **Providing guidance on addressing unreasonable health and safety risks, promoting voluntary compliance, and strategies to address non-compliance.** For instance, the policy provides guidance on proper noticing prior to any encampment intervention. The policy also addresses the storage of individuals' property, in the event of an intervention. It also provides guidance on compliance to balance the rights of encamped individuals against the City's fundamental duty to maintain public safety and public health.

The policy also includes an equity provision in recognition that 70 percent of Oakland's homeless population are African American, and the vast majority of known encampments are within communities of concern.¹³ Accordingly, the policy was developed with an intentional focus on achieving the following equity outcomes:

- Health and safety standards are achieved and maintained for encampment residents who are disproportionately Black, Indigenous, and Persons of Color (BIPOC).
- BIPOC neighborhoods and businesses are not disproportionately impacted by vehicle and street encampments.
- Service provisions close disparities in BIPOC groups' representation in homelessness.

¹³ Communities of concern are determined by eight factors: minority, low-income, level of English proficiency, elderly (over 65), zero-vehicle households, single parent households, disabled, and rent-burdened households.

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The policy requires that an equity analysis be conducted in coordination with the City's Department of Race and Equity after the adoption and implementation of the policy to ensure the stated outcomes are achieved and maintained. Furthermore, the policy will undergo a semi-annual equity review to determine its effectiveness in relation to the equity indicators and outcomes consistent with guidelines and best practices promoted by the City's Department of Race and Equity.

The policy also requires the City launch at least one co-governed encampment pilot on public land in 2021. The policy requires the pilot be developed in collaboration with the unhoused community, advocates, housed and business neighbors, and the councilmember of the district.

To be more proactive, programmatic, and strategic, the City will need to formalize its encampment management activities into a more formal program

To be more proactive, programmatic, and strategic, the City will need to formalize its encampment management activities into a more formal program. The City needs to establish a more formal structure more akin to how other programs are managed. This formal management structure should include

- establishing measurable goals and objectives,
- developing written strategic plans for achieving goals and objectives,
- developing annual work plans to implement strategies and achieve goals and objectives,
- establishing formal systems for tracking progress in implementing strategies,
- developing annual budgets and tracking costs for encampment management activities,
- determining the appropriate staffing levels, the appropriate composition of staff, and defining the roles, responsibilities, and authority of staff,
- developing written policies and procedures to guide the implementation of the new policy,
- developing data collection systems to manage encampment activities, and
- ensuring staff are adequately trained.

The City needs to develop formal goals, objectives, strategies, and annual workplans to effectively implement the City's new Encampment Management Policy

The City needs to establish measurable and achievable goals and objectives for its encampment activities. These goals and measurable objectives should formally communicate what the City hopes to achieve with its encampment management activities. Measurable goals and objectives would also assist the City in determining to what degree its efforts are succeeding in achieving intended results and whether its activities are having a positive effect (health, safety, equity) on sheltered and unsheltered Oaklanders.

A study from Arizona State University identified some potential measures of effectiveness for managing homeless encampments. These include but are not limited to

- reduced numbers of encampments and the homeless living in them,
- less crime in areas around the encampments,
- fewer resident complaints about the homeless' behavior and encampments,
- fewer health and safety hazards associated with encampments,

Audit Results

- reduced number of conflicts between the homeless and others over use of public space,
- fewer or less serious crimes committed against the homeless living in encampments,
- fewer calls for police service to the encampment area,
- fewer calls for police service for nuisance problems caused by the homeless,
- fewer calls for police service by businesses and residents concerning the homeless, and
- lower costs of police response dealing with homeless encampments.

In addition to these measures, the City needs to establish formal goals and objectives for addressing the equity outcomes specified in the new policy.

The City also needs to establish a strategic plan for achieving its goals and objectives, specifically related to encampment management. A strategic plan assists a formal program in providing a sense of direction and defining the activities to achieve stated goals and objectives.

Additionally, the City needs to establish annual workplans. These workplans should identify goals and deadlines for the next year, the strategies for achieving them, and provide transparency around the work to be accomplished. To ensure its efforts are achieving the desired outcomes, the City should also establish formal systems for tracking progress in implementing strategies.

The City needs to budget and account for encampment activities

Budgets are statements of value that reflect organizational priorities. The budget process requires organizations to consider actual and estimated expenditures in light of available revenues; defines spending limitations; and essentially serves as a roadmap for how public funds will be used. The budget process can help hold government agencies accountable, as each budget cycle provides an opportunity to evaluate whether funds have been used for their intended purposes and whether those purposes have produced desired results.

As stated in Section 3, the City does not possess a specific, programmatic budget that covers the full scope of the encampment management activities it performs. Because encampment activities are not budgeted for in full, the City lacks a formal fiscal plan for encampment activities. The lack of a budget for encampment management inhibits the City's ability to understand, monitor, and evaluate the role of encampment management as part of its larger strategy for addressing homelessness. It also limits the City's ability to consider how scarce resources might be allocated between encampment management and other programs, reduces opportunities for public oversight and input on funding decisions about encampment management, and prevents the City from determining whether funds are being expended efficiently or allocated toward the most effective actions for serving the homeless population. These concerns were echoed by City staff in interviews.

As noted in Section 3, the City incurred approximately \$12.6 million in direct costs related to encampments and does not have formal systems in place to account for the costs associated with encampment activities. Our estimate above does not include overhead costs. When establishing a budget for the encampment management program, all these costs should be considered and included to fully account for the true cost of encampment interventions.

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Other cities have experienced similar financial reporting challenges and have recommended the use of budgeting and improved citywide cost tracking systems as solutions to financial data quality issues and capturing comprehensive financial information. The City of San Diego recently recommended the development of a “funding strategy and long-term financial plan” to accurately identify the full cost of the homeless services it provides (including encampment abatement) and monitor whether departmental spending is achieving the City’s homelessness goals. The City of Seattle is currently developing a tracking system for encampment abatement costs across City departments, and the City of San José has recommended changes to its expenditure tracking system to more precisely monitor spending that occurs at the programmatic or service level.

The City needs to determine appropriate staffing levels, roles, and the composition of staff for future encampment management activities

Based on the City’s experience with encampment activities over the last several years, the City should be better able to assess its staffing needs and the mix of staffing necessary to manage encampments in the future. The City should re-assess its staffing to determine whether additional resources are needed to carry out the new policy. The City should also re-assess whether the current mix of staff is appropriate as the City moves forward in managing encampments. For instance, the City should re-assess whether the current levels of law enforcement staff are needed. Currently, the Police Department participates in all interventions to create a safe working zone for City staff. However, certain homeless individuals, especially immigrants and refugees, might be reluctant to speak with police officers. Research has found that immigrants are less likely to report crimes to the police for reasons including: negative experience with law enforcement in country of origin, fear of the police due to immigration status, and cultural and language barriers. Other jurisdictions are using different staffing models to address homeless encampments. The City of Austin Homeless Outreach Team (HOST) operates in sections of the City to address the needs of people living on the streets. The HOST includes two police officers, two behavioral health specialists, one paramedic, and one outreach social worker.

Additionally, the City will need to determine whether other skill sets are needed to implement the new policy. For instance, the City will need to monitor encampments on an on-going basis to ensure that encampments are complying with the new policy. This type of monitoring may require a skill set like Code Enforcement inspectors to monitor encampments to ensure they are complying with the new policy. The City may also need administrative staff to manage the data collection around encampments. As mentioned in other sections of this report, the City needs better data collection methods and documentation requirements to provide appropriate, consistent, and reliable information on its encampment activities.

The City also needs to clearly define and document the roles, responsibilities, and authority of staff working on encampment activities. Teams function more effectively and efficiently when members share a common understanding of their respective roles, responsibilities, authority, and the expectations they hold for one another when working together to accomplish their vision, mission, goals, and objectives.

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The City should develop policies and procedures for guiding the effective implementation of the new Encampment Management Policy

Policies and procedures are an essential part of any organization. Together, policies and procedures provide a roadmap for day-to-day operations. They ensure compliance with laws and regulations, give guidance for decision-making, and streamline internal processes. Written policies and procedures are particularly important for managing the City's encampment activities because of the interdepartmental nature of the City's encampments.

Some of the areas in need of clear policies and procedures include but are not limited to

- establishing a definition and criteria for what constitutes an encampment,
- establishing thresholds for responding to and providing encampment interventions and services,
- monitoring the conditions of encampments for compliance with the Encampment Management Policy,
- enforcing the Encampment Management Policy, and
- assigning responsibility for conducting the racial equity analysis and the semi-annual review, as well as defining how these requirements will be met.

As mentioned in the background section of this report, federal, state, and local governments, including Oakland, have not established a single definition of encampments. A HUD report from January 2019 states, "Researchers and other experts have not yet developed a single, standard set of criteria defining a group of people experiencing unsheltered homelessness as an 'encampment.'" Defining the term 'encampment' would allow the City to establish thresholds for responding and providing encampment interventions and services. It would also allow the City to maintain consistent data on encampment activities and to monitor implementation based upon established guidelines and encampment management policies. The definition of encampments should consider, but not be limited to, the size, type of structure, and length of stay.

The City's new Encampment Management Policy establishes areas where unmanaged encampments are presumed to cause unreasonable health and safety impacts due to the nature of the location. In addition, the new policy designates where enforcement will not be prioritized. These areas are to be monitored and managed by the EMT. These areas have a set of standards that need to be followed and encampments that do not comply with the standards and with applicable and generally enforced state codes and local ordinances, are subject to EMT intervention.

The City will need to develop a written policy and procedure defining how it will monitor compliance with the new encampment policy. It will also need a policy and a procedure defining how it will enforce the policy when encampments are out of compliance. These policies and procedures will define parties responsible for carrying out these policies, as well as procedures.

As noted above, the City's new Encampment Management Policy requires the City to conduct a racial equity analysis to assess whether the stated equity outcomes are achieved and maintained. Furthermore, the policy requires a semi-annual equity review to determine its effectiveness in relation

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to the equity indicators and outcomes consistent with guidelines and best practices promoted by the City's Department of Race and Equity. The City needs to develop a policy assigning responsibility for conducting the racial equity analysis and the semi-annual review, as well as procedures defining how these requirements will be met.

The City needs more data to effectively measure the desired outcomes

Strong performance management rests on the simple principle that "what gets measured gets done." In an ideal performance measurement system, metrics flow from the top-level strategic objectives down to the daily activities of its frontline employees. Managers continually monitor those metrics and regularly engage with their teams to discuss progress in meeting the targets.

The City needs to improve its data collection systems to manage the City's encampment activities

The City needs to improve its data collection systems related to encampment activities, including

- data to assess whether the City is achieving its goals and objectives,
- activity information, and
- master list of encampments.

The City should determine the data needed to assess whether it is meeting its established encampment management goals and objectives. Further, the City will need to develop metrics for key encampment management activities, including but not limited to

- interventions conducted by type,
- encampments provided various hygiene services,
- garbage services,
- garbage tonnage removed from homeless encampments,
- inspections conducted at encampments,
- condition reports on encampments,
- complaints received from residents and businesses
- fires and medical emergencies at encampments,
- crime statistics at encampments,
- response times to emergencies at encampments, and
- enforcement actions conducted.

The City also needs to track the number of residents in encampments, as well as demographic information to provide a basis for assessing whether the City is achieving equity outcomes specified in the Encampment Management Policy.

A master list of encampments will be an important tool in assisting the City to monitor encampments to ensure that encampments are following the new policy. The City currently lacks an accurate, comprehensive list of encampments. The latest encampment list was updated in October 2020. Prior to this update, the City had not updated the list since May 2019. We tested the accuracy and completeness

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of the City's current list of 140 encampments updated in October 2020. Based on our sample of 41 encampments, 12 encampments were no longer in existence and we also identified 5 encampments that were not on the list. Thus, we concluded that the City's current list is not complete and accurate. This suggests that the City needs to continually update its master encampment list to ensure it has a complete and accurate inventory of encampments that need to be managed.

Although encampments are difficult to track due to the frequent changes in size and location, the City must develop and maintain an accurate, comprehensive master list of encampments to monitor compliance with the new policy.

The City needs to maintain data to comply with federal, state, and regional permits

Besides monitoring the encampments for compliance with the new policy, the City needs to develop and maintain a master list of encampments to comply with new permit requirements established by the Bay Area Regional Water Quality Control Board (Control Board). The Federal Clean Water Act (Act) addresses urban stormwater runoff pollution of the nation's waters. In response to the Act, the US Environmental Protection Agency (EPA) promulgated rules establishing the National Pollution Discharge Elimination System (NPDES) stormwater program. The rules require municipal operators that serve populations of 100,000 or greater to implement a stormwater management program to control polluted discharges. The Control Board regulates the City's discharges to the storm drains, which flow to San Francisco Bay.

The Control Board issues county-wide permits to the municipal operators approximately every five years that address the conditions the municipalities and local agencies in the county must comply with to regulate the discharge of pollutants into the storm drains. In November 2015, the Control Board re-issued the county-wide municipal stormwater permits on the Municipal Regional Stormwater NPDES Permit to regulate stormwater discharges from municipalities and local agencies in Alameda, Contra Costa, San Mateo, and Santa Clara counties, and the cities of Fairfield, Suisun City, and Vallejo.

The Control Board is developing a new NPDES permit and has developed and released an administrative draft permit for public comment. The draft permit contains provisions to address the management, tracking, and reporting of non-stormwater discharges from homeless encampments. The draft permit will require municipalities such as Oakland to create a map identifying the location of encampments, both formal and informal, including but not limited to, informal tent or small cabin encampments, formal encampments, areas where residents are living in parked vehicles, and safe parking areas. The map should identify the locations of these encampments in relation to storm drain inlets and existing streams, rivers, and flood control channels, as well as other surface water bodies within the permittee's jurisdictions.

City staff need training on crisis management and interacting with traumatized encampment residents

As noted in Section 1, City staff working on encampment activities reported difficulties in working in a stressful, intense environment. As a result, staff reported trauma and have needed to obtain counseling

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services to help deal with the stress of the work. City staff reported being threatened on multiple occasions with weapons such as guns, an axe, a dog, and endured multiple verbal confrontations.

Most of the City staff working on encampment activities have not received training on how to interact with encampment residents that are dealing with trauma and/or mental health issues and how to use crisis intervention practices in situations with homeless residents. Staff in the Police Department's Abandoned Auto Unit specifically cited the need for training on how to deal with encampment residents that live in abandoned autos or encampments.

The City of Seattle's former Navigation Team, which is comparable to the City's Encampment Management Team, received a four-hour training on trauma informed care from the King County Health Department. The U.S. Substance Abuse and Mental Health Services has commissioned a Trauma-Informed Toolkit for Homeless Services, in recognition that homeless individuals have significant histories of trauma that impact their current functioning and needs. This toolkit is designed to be used by homeless-serving programs to evaluate how well trauma-informed practices are incorporated, identify areas for organizational growth, and make practical changes using their self-assessment evaluation as a guide.

Conclusion

In October 2020, the City Council adopted a new encampment policy that was scheduled to take effect in January 2021. The new policy will significantly change how the City manages homeless encampments throughout the City. To effectively implement the policy, the City will need to take a more proactive, programmatic, and strategic approach in managing encampments throughout the City. Such an approach includes establishing a more formal structure modeled on how other programs are managed. This includes establishing goals, objectives, strategies, and annual workplans for achieving the City's vision, a budget for encampment management activities, assessing staffing roles and requirements, implementing written policies and procedures, better management information, and staff training.

Recommendations

To implement more formal systems to manage encampment activities, the City should

15. Develop written goals and objectives for its encampment management activities. These goals and objectives should formally communicate what the City hopes to achieve with its encampment management activities.
16. Develop a strategic plan that includes written strategies for achieving its encampment management goals and objectives and establish formal systems for assessing the City's progress in implementing these strategies.
17. Develop annual work plans identifying goals and deadlines for the next year and the strategies for achieving them.
18. Develop a formal comprehensive budget for encampment management activities including all direct and indirect costs.

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19. Establish funding/project codes to track expenditures for encampment-related activities across City departments.
20. Perform a staffing analysis to assess the City's staffing requirements for encampment management activities. The staffing analysis should not only address the number of staff needed to carry out encampment management activities but should also address the appropriate mix and composition of staff needed to effectively administer the new encampment policy. This staffing analysis, at minimum, should assess the need for
 - police officers providing the current level of security at encampment interventions,
 - staff resources needed to monitor and enforce the encampment policy, and
 - administrative staff needed to improve recordkeeping
21. Clearly define and document roles, responsibilities, and authority of all staff working on encampment activities, to ensure all staff have a shared understanding of their respective roles, responsibilities, authority, and the expectations they hold for one another.
22. Develop and implement written policies and procedures for carrying out all its encampment management activities. These policies and procedures should
 - Establish a definition, including criteria, for the term 'encampment' and thresholds for responding to and providing services to the various encampments.
 - Determine how the City will monitor encampments to ensure compliance with the new Encampment Management Policy.
 - Determine how the City will enforce the new encampment policy when encampments are not complying with the Encampment Management Policy.
 - Determine how the City conducts its racial equity analysis and the semi-annual review to ensure the desired outcomes are achieved.
23. Develop data collection systems that includes
 - information needed to measure the City's progress in achieving its encampment management goals and objectives,
 - activity reports that provide information to management such as the number of interventions conducted by types, the number of encampments provided various hygiene services, the number of garbage services, the amount of garbage removed from encampments, the number of inspections conducted of encampments, condition reports on encampments, the number of complaints received from residents and businesses, the number of fire and medical emergencies at encampments, crime statistics, emergency response times to encampments, and the number of enforcement actions conducted, and
 - demographic information on encampments to facilitate the racial equity review and the semi-annual review to ensure the desired equity outcomes are achieved.
24. Assign responsibility for developing and maintaining a comprehensive master list of encampments, which maps the locations of encampments, both formal and informal, including but not limited to, informal tent or small cabin encampments, formal encampments, areas where residents are living in parked vehicles, and safe parking areas. This master list should include the population and demographics of the encampments. The maps should also identify the locations of these encampments in relation to storm drain inlets and existing streams, rivers,

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and flood control channels, as well as other surface water bodies within the City to ensure compliance with federal, state, and regional permits.

25. Develop formal training programs for City staff working on encampment activities. This training should include training on crisis interventions and understanding, recognizing, and interacting with encampment residents suffering from trauma.
26. Use the 'U.S. Substance Abuse and Mental Health Services' Trauma-Informed Toolkit for Homeless Services to evaluate how well trauma-informed practices are incorporated into the City's encampment practices to identify areas for organizational growth, and make practical changes using their self-assessment tool-kit.

Objectives, Scope, and Methodology

Objectives

The audit had the following objectives:

1. Determine the cost of the encampment management services.
2. Determine how many encampments exist in the City of Oakland.
3. Assess the quality of conditions at encampments.
4. Assess whether the City is achieving its goals and objectives.
5. Determine response times for 911 and 311 calls.
6. Assess the closure notification process.
7. Assess the bag-and-tag process.
8. Identify best practices.
9. Assess the quality of data around the encampment management services.

Scope

The scope of the audit includes fiscal years 2018-19 through 2019-20 and includes the current policy the City Council approved in October 2020.

Methodology

To achieve the audit objectives, we

- Reviewed policies relevant to encampment management including, the Encampment Management Policy 2017, the Temporary Encampment Management Policy March 2020, the Encampment Management Policy January 2021 and Public Works' Standard Operating Procedures.
- Reviewed City Council meetings related to encampment management and related staff reports.
- Interviewed City management and staff from the Departments of Human Services, Public Works, Police, Fire, Parks, Recreation and Youth Development, Transportation, Office of the Mayor, City Administrator, and City Attorney to gain an understanding of their roles related to encampment management activities.
- Interviewed homeless individuals and advocates.
- Reviewed City of Oakland's PATH framework.
- Reviewed Alameda County's Point-in-Time Homeless Survey and a United States Department of Housing and Urban Development study released in late 2019.
- Reviewed the current and draft Water Board permits.
- Reviewed relevant City, state, and federal guidelines.
- Reviewed audits and related best practices of homeless services in other jurisdictions.
- Performed a site visit of Public Works' storage facility to assess whether the bag-and-tag procedures were followed.
- Obtained a list of City-funded shelter options including emergency shelters, Community Cabins, RV sites, and transitional housing.
- Reviewed relevant legal proceedings.

Objectives, Scope, and Methodology

- Surveyed departments to identify the impact of homelessness on their work/services.
- Observed a sample of encampment closures.
- Reviewed the Encampment Management Team schedule to assess the quality of data and identify the number of closures, cleanings, garbage services, and hygiene services.
- Obtained and reviewed Police and Fire emergency call data and 311 service requests to analyze response times.
- Selected a sample of encampments from the City's October 2020 master list of encampments to verify its completeness and accuracy.
- Selected a sample of encampment closures/cleanings to verify that required notifications were posted.
- Reviewed Police Department's homicide report and identified those specifically related to encampments.
- Estimated costs incurred by departments on encampment management activities by calculating costs of staff time, equipment, materials, and third-party contracts.
- Reviewed workers' compensation claims related to homelessness.
- Reviewed and summarized actual homeless related expenditures and approved budgets.
- Obtained and reviewed research and other documents on the impact of homeless encampments on encampment residents, City staff, businesses, and the community.

Statement of Compliance with Government Auditing Standards

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.

Appendix

Detailed cost analysis and description of encampment activities

Exhibit 15: Cost analysis summary for all City departments and offices fiscal years 2018-19 and 2019-20

Departments and Offices	FY 2018-19	FY 2019-20	2-Year Total	% Change
Public Works	\$ 1,569,000	\$ 1,652,000	\$ 3,221,000	5%
Police Department	\$ 1,469,000	\$ 1,628,000	\$ 3,097,000	11%
Human Services	\$ 811,000	\$ 1,333,000	\$ 2,144,000	64%
Fire Department	\$ 733,000	\$ 1,032,000	\$ 1,765,000	41%
City Attorney	\$ 415,000	\$ 822,000	\$ 1,237,000	98%
City Administrator	\$ 191,000	\$ 296,000	\$ 487,000	55%
Transportation	\$ 168,000	\$ 145,000	\$ 313,000	-14%
Parks, Recreation & Youth Development	\$ 88,000	\$ 116,000	\$ 204,000	32%
Mayor	\$ 12,000	\$ 74,000	\$ 86,000	517%
Total	\$ 5,456,000	\$ 7,098,000	\$ 12,554,000	30%

Below are the departments' and offices' detailed cost information associated with encampment activities, as well as their respective responsibilities for encampment activities.

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Department of Public Works

As Exhibit 16 shows, we estimate Public Works incurred costs of approximately \$3.2 million on encampment activities in fiscal years 2018-19 and 2019-20.

Exhibit 16: Oakland Public Works' cost of encampment activities in fiscal years 2018-19 and 2019-20

Oakland Public Works	FY 2018-19	FY 2019-20	% Change
KOCB Labor	\$1,233,000	\$1,314,000	7%
KOCB Equipment	\$180,000	\$246,000	37%
Parks Maintenance Labor, Materials, and Equipment	\$135,000	\$82,000	-39%
Hazardous Waste Removal Contracts	\$21,000	\$10,000	-52%
Total	\$1,569,000	\$1,652,000	5%
Combined Total	\$3,221,000		

As Exhibit 16 shows, Public Works incurred a total of \$3.2 million in the two fiscal years, of which \$1.6 million was incurred in FY 2018-19 and \$1.7 million in FY 2019-20, an increase of 5 percent between the two fiscal years. These labor costs were for staff of Keep Oakland Clean and Beautiful (KOCB) and Parks Maintenance staff. In addition, Public Works incurred additional costs for materials, equipment, and contracts.

KOCB Labor: In fiscal years 2018-19 and 2019-20, KOCB staff in Public Works incurred approximately \$2.5 million in labor costs¹⁴ associated with encampment activities. The KOCB Division is responsible for cleaning and clearing activities at encampment interventions throughout the City. Typically, the KOCB encampment crew has nine employees from KOCB's Illegal Dumping Section. These positions include Street Maintenance Leaders, Public Works Maintenance Leaders, a Heavy Equipment Operator, and a Public Works Supervisor. While 9 employees are typical, the number of employees on the crew can range from 4 to 12, depending on the size of an encampment. When assigned to an encampment crew, employees spend approximately 80 percent of their time (32 hours per week) on encampment-related activities.

KOCB also performs garbage services for approximately 40 encampments on a weekly basis and two encampments twice a week due to the large amount of garbage generated. Before COVID, KOCB performed garbage services to encampments twice a week, but they have doubled to four times a week since the pandemic began.

KOCB Equipment: In fiscal years 2018-19 and 2019-20, Public Works incurred approximately \$426,000 in equipment costs associated with the various interventions at encampments. The KOCB Division of Public Works rents equipment from its Equipment Services Division at a fixed monthly rate. Equipment

¹⁴ KOCB staff working on encampment interventions receive premium pay, which is included in the labor costs.

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used for encampment interventions include: 25 cubic yard packers, pick-up trucks, lightning and front-end loaders, a dingo, and a trailer.

Parks Maintenance Labor, Materials, and Equipment: In fiscal years 2018-19 and 2019-20, the Parks Maintenance Division of Public Works incurred \$217,000 in labor, material and equipment costs associated with illegal dumping at City Parks. The Parks Maintenance Division's role is to remove illegal dumping at parks, much of which is attributed to encampment residents. In the past, this division assisted in encampment operations, however, this is no longer the City's practice.

Hazardous Waste Removal Contracts: In fiscal years 2018-19 and 2019-20, Public Works incurred approximately \$31,000 in contract costs. Public Works uses a third-party contractor for hazardous waste removal and clean-up services at encampments. Hazardous waste includes waste such as hypodermic needles, feces, and sewage.

Cost Analysis Methodology

Calculating Labor Costs

1. Identified staff by position and the percentage of their total time spent on encampment-related work in fiscal years 2018-19 and 2019-20.
2. Identified one individual per position and obtained the corresponding Oracle report that shows actual and fully burdened labor costs and removed overtime costs as most overtime assignments were unrelated to work at encampments.
3. Applied the number of positions per classification to the labor cost identified in step two.
4. Added each employee's annual labor cost to arrive at the department's total encampment-related labor cost for each fiscal year.

Calculating Equipment Costs

1. Obtained the Public Works' rental report for equipment which shows monthly rental rates for each piece of equipment.
2. Obtained the list of equipment used for operating closures, cleanings, and garbage services and identified the monthly rental cost for each piece of equipment.
3. Multiplied the monthly rental cost for each piece of equipment by 12 months then added the cost of all items to arrive at the annual equipment rental cost.
4. Multiplied the annual equipment rental cost by 80 percent because KOCB works on EMT operations 80 percent of the week.

Calculating Hazardous Waste Contract Costs

1. Identified annual payments to Public Work's hazardous waste contractors for fiscal years 2018-19 and 2019-20.
2. Public Works estimated that 15 percent of hazardous waste payments are related to encampments. Applied 15 percent to all payments made to the hazardous waste contractor in FY 2018-19 to estimate encampment-related hazardous waste payments.

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3. For the first half of FY 2019-20, the same methodology as the step above was used to calculate encampment-related hazardous waste payments. Starting the second half of the fiscal year, the City started using specific codes to track encampment-related costs, so these codes were used to identify encampment-related costs in the second half of FY 2019-20.

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Police Department

As Exhibit 17 shows, we estimate that the Police Department incurred approximately \$3.1 million in costs associated with encampment activities in fiscal years 2018-19 and 2019-20.

Exhibit 17: Police Department’s cost of encampment activities for fiscal years 2018-19 and 2019-20

Oakland Police Department	FY 2018-19	FY 2019-20	% Change
Homeless Outreach Team Labor	\$829,000	\$875,000	6%
Abandoned Auto Unit Labor	\$372,000	\$432,000	16%
Patrol Labor	\$268,000	\$321,000	20%
Total	\$1,469,000	\$1,628,000	11%
Combined Total	\$3,097,000		

As Exhibit 17 shows, the Police Department incurred an estimated \$1.5 million in encampment-related costs in FY 2018-19 and another \$1.6 million in FY 2019-20. The Police Department’s costs are for labor costs associated with the Homeless Outreach Team, the Abandoned Auto Unit, and Patrol costs associated with responding to 911 emergencies at encampments.

Homeless Outreach Labor: In fiscal years 2018-19 and 2019-20, we estimate the Police Department’s staff incurred approximately \$1.7 million in costs associated with encampment activities to provide support at closures, cleanings, and garbage services. The Police Department’s Homeless Outreach Team has three employees, a Police Sergeant and two Police Officers, who dedicated 100 percent of their time to encampment-related work. In some instances, additional officer support is needed during larger operations to provide safety to the Public Works’ crews. When additional officers are needed, the Police Department pays the officer’s overtime to work at the encampment interventions. We could not estimate the cost of the additional officers for all of FY 2018-19 and the first seven months of FY 2019-20 because the Police Department did not start tracking the overtime costs associated with encampment activities until February 2020. Based on overtime data provided by the Police Department, the overtime costs for additional officers between February and June 2020 totaled \$7,000. During this period, the City was conducting fewer interventions due to COVID. Therefore, we could not develop an accurate estimate of these costs for the two fiscal years and excluded it from our analysis.

Abandoned Auto Unit Labor: In fiscal years 2018-19 and 2019-20, we estimate that the Police Department incurred over \$800,000 in labor costs in both fiscal years to provide support at moderate to large encampment closures. The Abandoned Auto Unit is responsible for traffic control and tagging and towing vehicles at encampments when necessary. On average, 6 to 10 civilian technicians from the Abandoned Auto Unit spend between 10 to 35 percent of their time on encampment-related work.

Patrol Labor: In fiscal years 2018-19 and 2019-20, we estimate that the Patrol staff incurred nearly \$600,000 in labor costs associated with responding to 911 emergency calls at encampments. Patrol staff responded to a total of 1,459 calls at encampments in both fiscal years.

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Additionally, the Police Department responded to 19 homicides at encampments in calendar year 2020. According to Police Department staff, homicides require much more intensive labor than other crimes therefore, its encampment-related costs may be higher than reported in this analysis.

Cost Analysis Methodology

Calculating Abandoned Auto Unit/Homeless Outreach Team Labor Costs

1. Identified staff by position and the percentage of their total time spent on encampment-related work in fiscal years 2018-19 and 2019-20.
2. Obtained an Oracle report that shows actual and fully burdened labor costs for the employees identified in step one.
3. Applied the percent of time worked on encampments to the average labor costs identified in step two for each position.
4. Added each employee's annual labor cost to arrive at the department's total encampment-related labor cost for each fiscal year.

Calculating Patrol Labor Costs

1. Obtained the Police Department's dispatch data for fiscal years 2018-19 and 2019-20 and isolated calls related to encampments.
2. Calculated the percent of encampment-related calls to all calls received by the Police Department's Dispatch Center for both fiscal years.
3. Applied the percent of encampment-related calls to the Police Department's Patrol costs for the respective fiscal year to arrive at estimated Patrol labor costs for each fiscal year.

Appendix

Human Services Department

As Exhibit 18 shows, we estimate Human Services incurred approximately \$2.1 million in costs in fiscal years 2018-19 and 2019-20.

Exhibit 18: Human Services' cost of encampment activities for fiscal years 2018-19 and 2019-20

Human Services Department	FY 2018-19	FY 2019-20	% Change
Labor	\$232,000	\$230,000	-1%
Health and Hygiene Services	\$226,000	\$750,000	232%
Street Outreach Services	\$353,000	\$353,000	0%
Total	\$811,000	\$1,333,000	64%
Combined Total	\$2,144,000		

As Exhibit 18 shows, Human Service incurred a combined total of \$2.1 million in costs in the two fiscal years, of which \$811,000 was incurred in FY 2018-19 and \$1.3 million in FY 2019-20. Total expenditures increased 64 percent between fiscal years 2018-19 and 2019-20. As shown above, the expenditures were for: Labor, Health and Hygiene Services, and Street Outreach Services. These items are described below.

Labor: In fiscal years 2018-19 and 2019-20, Human Services incurred approximately \$462,000 in labor costs associated with encampment activities. These costs include a portion of the salaries and benefits of four Human Services staff who are responsible for attending EMT meetings, managing contracts for encampment services, providing outreach services, managing hygiene interventions, and other encampment-related activities.

Health and Hygiene Services: In fiscal years 2018 and 2019, Human Services incurred costs of nearly \$1 million on health and hygiene services at encampments. Human Services provides health and hygiene interventions at encampments by providing portable toilets, wash stations, and mobile showers. Human Services has managed these interventions since 2017. A more formal program was developed in late 2018; and, in early 2019, Human Services created a full-time direct services position within the department to provide outreach specifically to support encampments in managing hygiene interventions. Starting in the spring of 2020, due to the COVID pandemic, the number of encampment sites receiving hygiene interventions was increased from 20 to 40.

Street Outreach Services: In fiscal years 2018-19 and 2019-20, Human Services incurred over \$700,000 in costs associated with contracted street outreach at encampments. Current street outreach services include general outreach to unsheltered individuals at encampments to build relationships, ensure basic needs are met, connect people to needed shelter and services, assist with connections to

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housing through the Coordinated Entry System,¹⁵ and assist people to obtain documents such as identification and social security cards. In addition, Human Services' outreach teams provide site profiles of encampments that may be scheduled for an intervention.

Human Services' work extends well beyond services provided to informal, unsanctioned encampments. In FY 2019-20, Community Housing Service's¹⁶ adopted budget was \$19.4 million. In FY 2020-21, the adopted budget increased to approximately \$48.5 million, reflecting the State of California HEAP and HHAP funds of approximately \$19 million (approved by City Council in May 2020 for expenditure in FY 2020-21 and beyond) and other funds allocated to address the rising cost of the homelessness crisis. Recent funds received from the state and federal governments can be spent over multiple years and have very specific funding requirements that limit their use. Most of these funds are used for homeless services outside the scope of encampment management. Human Services oversees the City's full array of services in response to addressing and ending homelessness for Oakland residents. These services include

- crisis response interventions such as street outreach, street based intensive case management (housing navigation), the Community Cabins program, and the Safe RV Parking Program,
- permanent shelter facilities for singles and families,
- transitional housing programs for unsheltered residents,
- permanent housing interventions (short-term and long-term subsidies, services to support people in housing),
- coordinated Entry – Human Services is the regional lead for implementing the Coordinated Entry system in Oakland,
- employment services for people who are unsheltered,
- homeless Prevention services to keep those most at risk of homelessness off the streets,
- hunger relief including the annual Thanksgiving dinner and brown bag distribution,
- coordination with County Health Care Services, Oakland Housing Authority, state agencies, and others to leverage and strengthen the system of support, and
- capacity building and investments in growing local, black-led agencies to support their work.

Cost Analysis Methodology

Calculating Labor Costs

1. Identified staff by position and the percentage of their total time spent on encampment-related work in fiscal years 2018-19 and 2019-20.

¹⁵ The Coordinated Entry system is a process developed to ensure all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs

¹⁶ Community Housing Services is a service area within the Human Services Department that administers contracts and partners with nonprofits to assist the homeless and near-homeless community with temporary shelter, hotel/motel vouchers, rental assistance, eviction prevention, transitional, and supportive and special needs housing.

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2. Obtained Oracle report that shows actual and fully burdened labor costs for each employee identified in step one for the two fiscal years.
3. Applied the percent of time worked on encampments to each employee's annual labor costs identified in step two.
4. Added each employee's annual labor cost to arrive at the total labor cost for each fiscal year.

Calculating Health, Hygiene, and Street Outreach Costs

1. Obtained and reviewed documentation from Human Services to identify health and hygiene and street outreach costs.

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Fire Department

As Exhibit 19 shows, we estimate the Fire Department incurred costs of approximately \$1.8 million on encampment activities in fiscal years 2018-19 and 2019-20.

Exhibit 19: Oakland Fire Department's cost of encampment activities in fiscal years 2018-19 and 2019-20

Fire Department	FY 2018-19	FY 2019-20	% Change
Fire Prevention Labor	\$279,000	\$397,000	42%
Fire Suppression	\$438,000	\$599,000	37%
Hazardous Waste Removal Contract	\$16,000	\$36,000	125%
Total	\$733,000	\$1,032,000	41%
Combined Total	\$1,765,000		

As Exhibit 19 shows, the Fire Department incurred \$733,000 in costs on encampment activities in FY 2018-19 and \$1 million in FY 2019-20. These costs include labor costs for Fire Prevention staff, the cost of fire suppression, and contracts associated with hazardous material clean up.

Fire Prevention Labor: In fiscal years 2018-19 and 2019-20, the Fire Prevention Bureau (Fire Prevention) incurred an estimated \$676,000 in labor costs for encampment activities. Fire Prevention staff inspects encampments for fire hazards, investigate causes of fires at encampments, and approve removal of hazardous waste at encampments. Four Fire Prevention staff are assigned to work on encampment-related work, including an Assistant Fire Marshal, a Fire Investigator, a Fire Inspector, and a Hazardous Materials Inspector. Although these positions are assigned to work on encampments, they do not spend all their time on encampment-related work. Between the four positions, the time spent on encampments work ranged from an estimated 15 percent to 80 percent of their time.

Fire Suppression: The Field Operations Bureau is responsible for emergency medical response, fire suppression, mitigation of disasters, and rescue activities. In fiscal years 2018-19 and 2019-20, we estimate that fire suppression incurred over \$1 million in labor and equipment costs associated with responding to fires at encampments. In fiscal years 2018-19 and 2019-20, the Field Operations staff responded to nearly 1,000 calls at encampments. The Fire Department also responds to medical emergencies at encampment; however, the department was unable to determine the number of calls received for medical emergencies at encampments. Thus, our estimate of the Fire Department's costs does not include the cost of responding to medical emergencies at encampments.

Hazardous Waste Removal Contract: In fiscal years 2018-19 and 2019-20, the Fire Department spent \$52,000 for payments to contractors for hazardous material clean-up at encampments.

Appendix

Cost Analysis Methodology

Calculating Fire Prevention Labor Costs

1. Identified staff by position and the percentage of their total time spent on encampment-related work in fiscal years 2018-19 and 2019-20.
2. Obtained an Oracle report that shows actual and fully burdened labor costs for each employee identified in step one for the two fiscal years.
3. Applied the percent of time worked on encampments to each employee's annual labor costs identified in step two.
4. Added each employee's annual labor cost to arrive at the department's total encampment-related labor cost for each fiscal year.

Calculating Fire Suppression Costs

1. Obtained the number of calls, by fiscal year, for incidents at homeless encampments.
2. Obtained the cost of a single response by fiscal year.
3. Assumed 75 percent of calls for service for incidents at homeless encampments required a single engine or single response.
4. Multiplied 75 percent of the total calls by the cost of a single engine cost to calculate the annual cost of using a single engine.
5. Assumed the remaining 25 percent of calls for service at homeless encampments required a larger engine response.
6. Calculated a larger engine response cost by adding the cost for a Battalion Chief, three engine companies, and one truck company to calculate the cost per incident.
7. Multiplied 25 percent of the total calls for incidents at homeless encampments to the cost calculated in step 6.
8. Finalized annual cost by adding the annual single response call cost with the annual larger engine response call cost.

Calculating Hazardous Waste Removal Contract

1. Identified annual payments to the Fire Department's hazardous waste contractor for fiscal years 2018-19 and 2019-20.
2. Identified total annual payments for both fiscal years. For FY 2019-20, we divided encampment-related costs (\$36,406) by the total annual payments to the third-party contractor, to determine that encampment-related payments represented 25 percent of OFD's total hazardous waste payment.
3. For FY 2018-19, because OFD did not track costs specific to encampments, we used the previously identified 25 percent in step 2 above and applied this percentage to the FY 2018-19 annual costs to arrive at encampment-related costs.

Appendix

City Attorney's Office

As Exhibit 20 below shows, we estimate the City Attorney incurred over \$1.2 million in costs associated with encampment activities in fiscal years 2018-19 and 2019-20.

Exhibit 20: City Attorney's cost of encampment activities in fiscal years 2018-19 and 2019-20

City Attorney's Office	FY 2018-19	FY 2019-20	% Change
Labor	\$413,000	\$792,000	92%
Expenses	\$2,000	\$30,000	1400%
Total	\$415,000	\$822,000	98%
Combined Total	\$1,237,000		

As Exhibit 20 shows above, the City Attorney incurred a combined total of over \$1.2 million in costs in the two fiscal years, of which \$415,000 was incurred in FY 2018-19 and \$822,000 in FY 2019-20, an increase of 98 percent between the two fiscal years. The City Attorney's costs associated with encampments increased by 98 percent between fiscal years 2018-19 and 2019-20, primarily due to the number of lawsuits filed against the City following the *Martin v. Boise* decision issued by the 9th Circuit Court of Appeals in September 2018.

Labor: The City Attorney's labor costs associated with encampment activities amounted to \$413,000 in FY 2018-19, and \$792,000 in FY 2019-20. Much of these costs were incurred defending the City in lawsuits and state agency enforcement actions. In addition, substantial costs were incurred providing legal services and advice to multiple departments and offices including: Human Services, Fire, Public Works, Housing and Community Development, Transportation, Police, City Administrator, and the Mayor's Office, on a broad range of encampment-related policies, legislation, reports, services and grant contracts, leases and other real property transactions, and other matters related to encampments.

Expenses: The City Attorney incurred expenses associated with encampment activities of approximately \$2,000 in FY 2018-19, and approximately \$30,000 in FY 2019-20. These expenses include support staff and litigation expenses such as depositions, mediation, and court transcripts.

Cost Analysis Methodology

1. Obtained and reviewed the documentation from City Attorney's office to identify the cost of labor and expenses.

Appendix

City Administrator’s Office

As the Exhibit 21 below shows, we estimated the City Administrator’s Office incurred costs of \$487,000 on encampment activities for fiscal years 2018-19 and fiscal years 2019-20.

Exhibit 21: City Administrator’s cost of encampment activities for fiscal years 2018-19 and 2019-20

City Administrator	FY 2018-19	FY 2019-20	% Change
Labor	\$191,000	\$296,000	55%
Total	\$191,000	\$296,000	55%
Combined Total	\$487,000		

As Exhibit 21 above shows, the City Administrator’s office incurred a combined total of \$487,000 in labor costs in the two fiscal years. Of this amount \$191,000 was incurred in FY 2018-19 and \$296,000 in FY 2019-20, an increase of 55 percent between the two fiscal years.

Labor: The City Administrator’s office coordinates the City’s cross-departmental and inter-agency responses related to homelessness. The City approved the creation of the Homeless Administrator position in June 2019 during the FY 2019-21 budget deliberations, to serve as the central coordinator of homelessness.

The City Administrator’s encampment-related labor costs include one Assistant to the City Administrator in both fiscal years and one Homeless Administrator in FY 2019-20. These positions spent between 25 to 75 percent of their time on encampment-related work, and as the Homeless Administrator was brought online, the Assistant to the City Administrator’s time was decreased accordingly.

Cost Analysis Methodology

1. Identified staff by position and the percentage of their total time spent on encampment-related work in fiscal years 2018-19 and 2019-20.
2. Obtained Oracle reports that show actual and fully burdened labor costs for the employees identified in step one.
3. Applied the percent of time worked on encampments to the average labor costs identified in step two for each position.
4. Added each employee’s annual labor cost to arrive at the department’s total encampment-related labor cost for each fiscal year.

Appendix

Department of Transportation

As Exhibit 22 below shows, we estimate that Transportation incurred over \$300,000 in costs associated with encampment activities in fiscal years 2018-19 and 2019-20.

Exhibit 22: Transportation’s cost of encampment activities for fiscal years 2018-19 and 2019-20

Department of Transportation	FY 2018-19	FY 2019-20	% Change
Labor	\$79,000	\$77,000	-3%
Materials and Equipment	\$89,000	\$68,000	-24%
Total	\$168,000	\$145,000	-14%
Combined Total	\$313,000		

As Exhibit 22 above shows, Transportation incurred \$313,000 in encampment-related costs in fiscal years 2018-19 and 2019-20. These costs were for labor, materials, and equipment.

Labor: In fiscal years 2018-19 and 2019-20, we estimate Transportation incurred approximately \$156,000 in labor costs. Transportation staff works on electrical issues that occur at encampments such as illegal wire splices and wire thefts. Specifically, they perform an analysis of the impact to the electrical system and perform repairs. Additionally, Transportation provided KOCB with a heavy equipment operator to assist with encampment interventions. In FY 2019-20, however, this position was transferred to Public Works.

Materials and Equipment: In fiscal years 2018-19 and 2019-20, we estimate that Transportation incurred approximately \$157,000 for cost of materials and equipment. Materials used to fix the compromised electrical infrastructure included electrical wiring, traffic signal wiring, electrical street light fixtures, pull box covers, electrical cabinets, locks, concrete, and other necessary electrical components.

Cost Analysis Methodology

DOT uses work orders to document work performed at encampments. Work orders specify labor, material, and equipment costs.

Calculating Labor, Materials and Equipment Costs

1. Obtained and reviewed encampment-related work order data.
2. Identified the cost of labor, materials, and equipment for fiscal years 2018-19 and 2019-20.

Appendix

Department of Parks, Recreation and Youth Development

As Exhibit 23 below shows, we estimate that Parks, Recreation and Youth Development incurred costs of over \$200,000 related to encampment activities in fiscal years 2018-19 and 2019-20.

Exhibit 23: Parks, Recreation and Youth Development cost of encampment activities for fiscal years 2018-19 and 2019-20

Parks, Recreation and Youth Development	FY 2018-19	FY 2019-20	% Change
Labor	\$88,000	\$116,000	32%
Total	\$88,000	\$116,000	32%
Combined Total	\$204,000		

As Exhibit 23 shows, we estimate that Parks, Recreation and Youth Development incurred \$88,000 in costs related to encampment activities in FY 2018-19 and another \$116,000 in FY 2019-20.

Labor: Parks, Recreation and Youth Development’s (PRYD) role related to encampment activities is to refer encampment issues to the EMT and to regularly attend the EMT meetings. PRYD is heavily impacted by homeless encampments located on City parks and recreation centers, but it does not play a role on the day of an intervention. We estimate that PRYD incurred over \$200,000 in labor costs. This includes two Recreation General Supervisors, six to seven Recreation Supervisors, one Facilities Manager, and one Recreation Center Director. These positions spent between 5 to 8 percent of their time on encampment-related work.

Cost Analysis Methodology

1. Identified staff by position and the percentage of their total time spent on encampment-related work in fiscal years 2018-19 and 2019-20.
2. Obtained an Oracle report that shows actual and fully burdened labor costs for the employees identified in step one.
3. Applied the percent of time worked on encampments to the average labor costs identified in step two for each position.
4. Added each employee’s annual labor cost to arrive at the department’s total encampment-related labor cost for each fiscal year.

Appendix

Mayor's Office

As the Exhibit 24 shows, we estimate the Mayor's Office incurred \$86,000 in costs related to encampment activities in fiscal years 2018-19 and 2019-20.

Exhibit 24: Mayor's Office cost of encampment activities for fiscal years 2018-19 and 2019-20

Mayor's Office	FY 2018-19	FY 2019-20	% Change
Labor	\$12,000	\$74,000	517%
Total	\$12,000	\$74,000	
Combined Total	\$86,000		

As Exhibit 24 shows, the Mayor's Office incurred a combined total of \$86,000 in costs in the two fiscal years, of which \$12,000 was incurred in FY 2018-19 and \$74,000 in FY 2019-20.

Labor: The Mayor's Office's role is to attend EMT meetings and engage in policy discussions related to encampment activities. However, they do not play a role on the day of an intervention. In FY 2018-19, the labor cost includes one staff who participated in EMT and policy meetings. In FY 2019-20 the labor cost included a Homeless Policy Director¹⁷ whose role is to serve as the Mayor's chief policy advisor to address Oakland's homeless crisis, represent the Mayor in key local, regional, and statewide efforts, and to help build public-private partnerships to test and evaluate innovative homelessness interventions. These positions spent between 5 and 50 percent of their time on encampment-related work in the two fiscal years.

Cost Analysis Methodology

1. Identified staff by position and the percentage of their total time spent on encampment-related work in fiscal years 2018-19 and 2019-20.
2. Obtained Oracle report that shows actual and fully burdened labor costs for the employees identified in step one.
3. Applied the percent of time worked on encampments to the average labor costs identified in step two for each position.
4. Added each employee's annual labor cost to arrive at the department's total encampment-related labor cost for each fiscal year.

¹⁷ This position is funded by a private grant.



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April 7, 2021

**The Honorable Courtney Ruby
Oakland City Auditor
1 Frank Ogawa Plaza, 4th Floor
Oakland, CA 94612**

RE: City Administrator's Response to the Homelessness Intervention Performance Audit

Dear City Auditor Ruby:

The City Administrator's Office appreciates the performance audit of the City of Oakland's homeless encampment management interventions and activities. Attached is management's response to the following recommendations:

- Enhance encampment intervention activities;
- Capture and identify emergency calls to encampments, including 311 Call Center responses;
- Develop systems for tracking and monitoring costs associated with encampment activities; and
- Implement more formal systems to manage encampment activities.

I want to thank you and your staff for the open communication during this audit. Management was kept up to date on all progress.

Sincerely,

Jason Mitchell, Assistant City Administrator on behalf of Edward
D. Reiskin, City Administrator

cc: LaTonda Simmons, Assistant City Administrator

Attachments: City Administration's Recommendation Implementation Plan Matrix



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
1	To enhance its encampment intervention activities, the City Administration should:			
	<p>1. Implement an organizational structure for the EMT that includes defined roles, responsibilities and authority, including a clearly defined decision-making process.</p>	<ul style="list-style-type: none"> • Create EMT org chart • Draft Operations Command statements for each department • Document workflow for complaints and interventions • Prepare decision matrix per workflow 	CAO	6/2021
	<p>2. Modify its encampment schedules to better document the types of interventions, the rationale for the intervention, the date of the intervention, the number of staff needed for the intervention, and the number of hours needed to complete the intervention.</p>	<ul style="list-style-type: none"> • Create Intervention Schedule • Create an Intervention Project Scope Template 	CAO	9/2021



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
	<p>3. Work with the EMT to develop a more user-friendly system for tracking encampment activities. This system should include drop-down menus to provide uniform naming conventions, as well as stronger controls to ensure that information on encampment activities are complete and consistently documented.</p>	<ul style="list-style-type: none"> • Engage IT for Needs Assessment/ Business Analysis • Assess/determine system needs • Identify systems/product/costs 	<p>CAO</p>	<p>5/2021- 1/2022</p>
	<p>4. Establish written criteria for determining which encampments should receive garbage services, portable toilets, and other hygiene services, and document which encampments are to receive these services based on these criteria.</p>	<ul style="list-style-type: none"> • Identify criteria per the EMP, Fire Safety Codes, and other guiding documents • Draft intervention models using criteria • Formalize/Adopt intervention models per criteria options 	<p>CAO/HSD</p>	<p>7/1/2021 9/30/2021 10/1/2021</p>



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
	<p>5. Modify the Encampment Management Policy to address outreach strategies prior to interventions. The outreach strategies should include:</p> <ul style="list-style-type: none"> • Establishing specific outreach goals • Defining and expanding roles and responsibilities for all stakeholders involved, including City staff and contracted service providers • Ensuring adequate funding • Implementing monitoring and reporting protocols to ensure internal and external stakeholders can track the effectiveness of outreach strategies 	<ul style="list-style-type: none"> • Establish client outreach intervention plan template that delineates staff and provider roles • Incorporate template within provider protocols • Identify electronic systems for documenting the work and sharing metrics • Identify funding and support for systems 	CAO/HSD	<p>5/25/2021</p> <p>7/1/2021</p> <p>7/15/2021</p> <p>8/1/2021</p>
	<p>6. Develop policies and procedures to document the City’s outreach efforts at encampments, including the outreach provided, the acceptance of services, and the alternative shelter offered.</p>	<ul style="list-style-type: none"> • Staff will create SOP to track service offer details and outreach regularity • Staff will establish digital and manual intake methods and reporting to track outreach • Staff will prepare reports and audit client interaction periodically to evaluate, performance, consistency, and other trends 	CAO/HSD	<p>Draft reqs 5/1/2021</p> <p>Pilot (Scope TBD subject to dev of APP) 6/1/2021</p> <p>Finalize 9/1/2021</p>

Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
	7. Evaluate other cities’ methods for informing encampment residents of impending interventions so that encampment residents are adequately notified of scheduled interventions.	<ul style="list-style-type: none"> • Staff will contact comparable cities to review notification methods for interventions • Staff will modify procedures to align with best practices 	CAO/HSD	9/15/2021
	8. Take appropriate actions to ensure City staff comply with the Standard Operating Procedure for the bag-and-tag process.	<ul style="list-style-type: none"> • Staff instituted an inventory form to verify allowable items for storage and disposal of non- storable items consistent with SOP • Staff now requires 2nd level validation and sign off for bag and tag inventories 	CAO/OPW	3/2021
	9. Evaluate other cities’ use of storage facilities to provide alternatives to the bag-and-tag process.	<ul style="list-style-type: none"> • Staff will follow up w/Los Angeles, San Jose and other comparable cities to assess practice on bag and tag procedures • Staff will modify City procedures to adhere to best practices. 	CAO/HSD/ OPW	7/2021
	10. Develop a clear, comprehensive policy for transportation assistance following an encampment closure or re-closure. The City contracts should align with any policy changes.	<ul style="list-style-type: none"> • Research/analyze policy on transportation models, determine costs • Draft recommendations, including funding options • Implement recommendation adopted, revise agreements; Pending funding approval 	HSD/CAO	5/2021 8/2021



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
2	To capture all emergency calls to encampments, the Police Department should:			
	<p>11. Modify its call reports to identify when staff respond to encampment calls.</p>	<ul style="list-style-type: none"> • The Communications Division uses incident type “encmp” for complaints regarding encampments and officer coding when clearing encampment related calls. Due to systems limitations, only one incident code can be applied with a limit of 5 disposition codes which can further describe the incident. If the call is crime related, the incident type re: the crime is applied in CAD and the department also applies the disposition code “encmp” when possible. • Implementation of the new CAD system (Premier One CAD) will allow unlimited disposition codes. • Until then, staff has asked Motorola, the current CAD vendor, to help identify more efficient tracking methods. • Staff will receive instruction to apply encampment codes consistent with the forthcoming definition created by these recommendations. 	OPD	11/2021



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
To more comprehensively identify emergency calls associated with encampments, the Fire Department should:				
	<p>12. Work with the records management software vendor and Fire Dispatch Center to establish a unique Incident Type that will allow the department to distinguish medical emergency calls at encampments from all other medical emergencies. Further, the Fire Department should ensure staff use the appropriate disposition code upon clearing the location.</p>	<ul style="list-style-type: none"> • March 2021 Oakland Fire Dispatch Center created an Incident Type and a Disposition code for all medical calls at encampments. Fire officers shall use the disposition code upon clearing the location to accurately track such calls. Fire Dispatch will manage the data collection for these incidents, and will add incident type figures to monthly and annual reports. 	The Fire Dispatch Center	5/2021
To address the concerning 311 Call Center response times, the City Administration should:				
	<p>13. Evaluate both the integrity of the 311 Call Center data and the resolution of calls regarding encampments.</p>	<ul style="list-style-type: none"> • Explore possible implementation and integration of complaint systems • Determine resources • Establish an accountability management plan • Ensure resolution and reporting of request 	CAO/EMT	3/2023

Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
3	To provide the City with systems for tracking and monitoring costs associated with encampment activities, the City should:			
	14. Document the amount of time spent, and staff needed, on encampment interventions such as closures, re-closures, cleanings, and hygiene services.	<ul style="list-style-type: none"> • Staff will create and utilize logs for the providers and staff planning and execution of field activities 	CAO/HSD	7/2021
4	To implement more formal systems to manage encampment activities, the City should:			
	15. Develop written goals and objectives for its encampment management activities. These goals and objectives should formally communicate what the City hopes to achieve with its encampment management activities.	<ul style="list-style-type: none"> • Draft operational goals/objectives/ mission 	CAO	6/2021
	16. Develop a strategic plan that includes written strategies for achieving its encampment management goals and objectives and establish formal systems for assessing the City’s progress in implementing these strategies.	<ul style="list-style-type: none"> • Using policy documents, establish goals for department functions, standards, methods of evaluation 	CAO/All Departments	1/2022
	17. Develop annual work plans identifying goals and deadlines for the next year and the strategies for achieving them.	<ul style="list-style-type: none"> • Analyze operations trends • Establish full cycle goals 	CAO/All Departments	7/2021



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
	<p>18. Develop a formal comprehensive budget for encampment management activities including all direct and indirect costs.</p>	<ul style="list-style-type: none"> • From tasks, document all supported funding 	<p>CAO</p>	<p>7/2021</p>
	<p>19. Establish funding/project codes to track expenditures for encampment-related activities across City departments.</p>	<ul style="list-style-type: none"> • Meet with Finance/Budget to assign funds/project codes for use by all departments supporting encampment management activities subject to fund use restrictions 	<p>CAO/All Departments</p>	<p>9/2021</p>
	<p>20. Perform a staffing analysis to assess the City’s staffing requirements for encampment management activities. The staffing analysis should not only address the number of staff needed to carry out encampment management activities, but should also address the appropriate mix and composition of staff needed to effectively administer the new encampment policy. This staffing analysis, at minimum, should assess the need for:</p> <ul style="list-style-type: none"> • Police officers providing the current level of security at encampment interventions • Staff resources needed to monitor and enforce the encampment policy • Administrative staff needed to improve recordkeeping 	<ul style="list-style-type: none"> • Assess EMT activity completion by intervention type • Assess budgeted support • Establish annual goals by intervention • Cost staffing support to # of proposed interventions 	<p>CAO/All Departments</p>	<p>9/2021</p>



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
	<p>21. Clearly define and document roles, responsibilities and authority of all staff working on encampment activities, to ensure all staff have a shared understanding of their respective roles, responsibilities, authority, and the expectations they hold for one another.</p>	<ul style="list-style-type: none"> • Using draft Operations Command document, create member authority/role for each department 	<p>CAO/All Departments</p>	<p>9/2021</p>
	<p>22. Develop and implement written policies and procedures for carrying out all its encampment management activities. These policies and procedures should include the following:</p> <ul style="list-style-type: none"> • Establish a definition, including criteria, for the term “encampment” and thresholds for responding to and providing services to the various encampments • How the City will monitor encampments to ensure compliance with the new encampment management policy • How the City will enforce the new encampment policy when encampments are not complying with the new encampment management policy • How the City conduct racial equity analysis and the semi-annual review to ensure the desired outcomes are achieved 	<ul style="list-style-type: none"> • Establish descriptions for the execution of tasks • Establish definition of “Encampment” • Establish Encampment Oversight standards • Establish Encampment Enforcement standards • Establish Racial Equity Analysis Scope with semi-annual review deadlines 	<p>CAO/All Departments</p>	<p>1/2022</p>



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
	<p>23. Develop data collection systems that includes the following:</p> <ul style="list-style-type: none"> • Information needed to measure the City’s progress in achieving its encampment management goals and objectives • Activity reports that provide information to management such as the number of interventions conducted by types, the number of encampments provided various hygiene services, the number of trash pick-ups, the amount of garbage removed from homeless encampments, the number of inspections conducted of encampments, condition reports on encampments, the number of complaints received from residents and businesses, the number of fire and medical emergencies at encampments, crime statistics, emergency response times to encampments, and the number of enforcement actions conducted • Demographic information on encampments to facilitate the racial equity review and the semi-annual review to ensure the desired equity outcomes are achieved 	<ul style="list-style-type: none"> • Engage IT for Assessment/Analysis • Assess/determine system needs • Identify systems/ product/costs 	<p>CAO</p>	<p>5/2021- 3/2022</p>



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
	<p>24. Assign responsibility for developing and maintaining a comprehensive master list of encampments, which maps the locations of encampments, both formal and informal encampments, including but not limited to, informal tent or small cabin encampments, formal encampments, areas where residents are living in parked vehicles, and safe parking areas. This master list should include the population and demographics of the encampments. The maps should also identify the locations of these encampments in relation to storm drain inlets and existing streams, rivers, and flood control channels, as well as other surface water bodies within the City to ensure compliance with federal, state, and regional permits.</p>	<ul style="list-style-type: none"> • Engage IT for Assessment/Analysis • Assess/determine system needs • Identify systems/ product/costs 	CAO	5/2021- 3/2022
	<p>25. Develop formal training programs for City staff working on encampment activities. This training should include training on crisis interventions and understanding, recognizing, and interacting with encampment residents suffering from trauma.</p>	<ul style="list-style-type: none"> • Develop and institute Homeless Engagement Strategy Guidelines • Staff will schedule trainings with partners and staff alike 	CAO/HSD	9/2021



Section	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date to Complete
	<p>26. Use the ‘U.S. Substance Abuse and Mental Health Services’ Trauma-Informed Toolkit for Homeless Services to evaluate how well trauma-informed practices are incorporated into the City’s encampment practices to identify areas for organizational growth, and make practical changes using their self-assessment tool-kit.</p>	<ul style="list-style-type: none"> • The City will obtain and review the Toolkit to incorporate practices into the Encampment Management practices 	<p>CAO/All Departments</p>	<p>12/2021</p>