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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN
RIGHTS, *et al.*,

Plaintiffs,

v.

CITY OF LOS ANGELES, *et al.*,

Defendants.

Case No. 2:20-CV-02291-DOC-KES

Assigned to Judge David O. Carter

**NOTICE OF FEEDBACK
REGARDING THE CITY'S
WEBSITE BY ORDER OF THE
COURT**

Before: Hon. David O. Carter
Courtroom: 10A
Hearing Date: March 4, 2024
Hearing Time: 8:30 p.m.

1 **TO THE COURT, ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF**
2 **RECORD:**

3 PLEASE TAKE NOTICE that pursuant to the Court’s request at the April 11,
4 2024 Status Conference re MOU between the Parties, LA Alliance for Human Rights’
5 submits their feedback regarding the City’s website.

6 Attached hereto as **Exhibit A** is a true and correct copy of LA Alliance for
7 Human Rights Initial Comments on City’s Homelessness Metrics Website.

8 Attached hereto as **Exhibit B** is a true and correct copy of the Overview of Safe
9 Parking reports on City Homelessness Programs Website.

10 Attached hereto as **Exhibit C** is a true and correct copy of a mock-up of what a
11 user-friendly website would look like with comments.

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13 Dated: April 25, 2024

Respectfully submitted,

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/s/ Elizabeth A. Mitchell

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4877-0463-4288, v. 1

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Exhibit A



LA Alliance for Human Rights Initial Comments on City’s Homelessness Metrics Website
<https://cao.lacity.gov/homeless/>

- The descriptions of subjects and categories are overly technical and barebones; they do not clearly describe the information they contain.
- The page is not user-friendly or intuitive. Using graphics will help users have an idea of what the information and links are.
- The page is very process/procedural oriented. The site is adequate if you know what you’re looking for or looking at and know how to read financial and statistical reports, but not helpful for the general public. Adding additional narrative will help people understand what they’re looking at, e.g. “Click here to see how many people have been permanently and temporarily housed through Inside Safe and how much the program has costs”.
- Consider “layering” the information so a casual user can get high-level information at first glance while others can dig into the details.
- The page contains information not directly related to program performance, e.g. committee meeting agendas. This information should be moved off the page unless agenda items are specifically relevant to transparency and performance. For example, there is no need to post the cancellation notice for the April 2024 Homelessness Strategy Committee meeting. Some of the meeting information is valuable, such as program status reports, but those reports should be linked to the program pages they pertain to.
- The reports, contracts, and resources linked on the webpage are not easy to read or understand. The City should create summary pages for reports and other information to quickly and easily communicate dollars spent, people served, or actions taken to assist those experiencing homelessness.
- The website is intended to show how the City is using public money and what that public money is accomplishing. For each program, Alliance Settlement Agreement, Freeway Agreement, and Inside Safe, the City should summarize the reports to indicate if they are financial reports or performance reports. Sources of funding and targets of spending in financial reports should be easily determined through tables or pie charts. Activities and their connection to goals and outcomes should be displayed through

tables, graphs, and charts. Numbers should accurately correspond to percentages and totals should be easy to understand.

- Information about specific projects should be summarized into one page. Each page should have a financial section and a performance section. The financial section should show from where project resources are sourced (local resources, state resources, and federal resources), who performs the work (contractor and subcontractor names and activities), and what the totals are for each quarter. The performance section should show the capacity of the project, the number of people served by the project, the outcomes and goals of the project, and the outcomes of the people served by the project.
- Invoices and contracts should be linked to contractors and subcontractors mentioned in the summary sheets. On their own, these contracts and invoices are not meant for public review and make little sense.
- Informational resources such as the Homeless Services Invoicing Workflow should be tailored to the general public and use charts or graphic illustrations to convey how invoicing is processed.
- There exists within the reports, expense breakdowns, contracts, and invoices a lot of information that does not make sense, nor does it easily explain how much money or how much activity is directed toward a particular goal or outcome and how that goal or outcome is being met.
- It is understandable that within the quick turnaround to create a working website in a matter of weeks information and resources would not be tailored to the public. The City appears to have linked to existing reports and information written for inter-departmental purposes instead of communicating to the general public. It is expected that over time reports and information linked on the website would become more user-friendly and clearer in reporting how much money has been spent on what programs to accomplish specific goals and outcomes.

Overview of Safe Parking Reports on City Homelessness Programs Website

The metrics report and invoices from Safe Parking L.A. are extremely confusing and difficult to reconcile. To understand the narrative, you need to look at the following documents:

- The [Safe Parking metrics](#) report on the website.
- The [Safe Parking invoice](#) from January 2024
- The [contract for managing the La Cienega Safe Parking site \(Contract # C-145058\)](#)
- A [general contract](#) (C-143196) and [its amendment](#) for Safe Parking LA (under the name of its parent NPO, Community Partners).

I noted the following inconsistencies and irregularities:

- The metrics report is for June 1, 2023 through March 18, 2024. It shows the following accomplishments:
 - Total enrollments (includes initial and subsequent enrollments by clients): 74
 - Total unique clients (includes primary and passenger clients): 70
 - Total unique households/vehicles: 59
 - Total clients exited (includes all exits – to housing, other programs, without services, and self-resolved): 51
 - Total placements into permanent and transitional housing: 21
- The invoice dates do not match the metrics report. The invoice is for October through December 2023. There is no way to tell if the clients served in the metrics report were served during or before the billing period.
- The contract (C-145058) amount listed on the invoice matches the contract amount of \$676,028, but note the contract is not for a full year; it is for the eight months between October 1, 2023 and May 31, 2024. Projecting \$676,028 over 12 months would be \$1,014,050. The contract does not specify a site, but the contract amount matches the contract amount stated on the La Cienega invoice.
- There is no contract specifically for the LA Cienega suite for June through September 2023. The general contract (C-143196) was for \$309,385 was dated from the date of execution (possibly March 31, 2023) through June 30, 2023. It was amended, effective April 28, 2023 through May 31, 2024 (about 13 months) for \$585,600, or 1.89 times the original amount, for a total of \$894,985. This contract does not specify a site or sites, so it may or may not have included the La Cienega site.

Because the service statistics in the metrics report go back to June 1, 2023, we do not know how many, (if any) clients were served before the current contract took effect in October 2023.

In both contracts, the reporting requirements are in Section 4:

Section 4.0 Reporting Requirements:

Each month, the Contractor will provide the following data to the City within 21 days of the close of the previous month:

1. Number of Participants served within the previous month, including the total head

- of households, accompanying minor and adult passengers*
- 2. Number of individuals that have transitioned into stable housing, specifying Permanent versus Interim Housing.*
 - 3. Referrals made, specifying type.*
 - 4. Tracking of timelines from intake completion to linkages to services and/or housing.*
 - 5. Number of Financial Assistance Disbursements and categories.*
 - 6. Participant success story when available.*

The Contractor will provide continued confirmation that information is populated timely into the Homeless Management Information System ("HMIS") and will use the California Interagency Council of Homelessness's HMIS funding codes.

At such times in any form as the City may require from the Contractor or Subcontractor, there shall be furnished to the City such statements, records, reports, data and information as the City may request pertaining to matters covered by this Agreement.

For any exceptions to the provisions of Section 4, Reporting Requirements, Contractor shall have obtained written approval from the City.

If Contractor's or Subcontractor's reports or other documentation are not submitted as required, the City reserves the right to withhold payments to Contractor or to impose other sanctions, at the City's sole discretion. These remedies are in addition to any rights granted to City herein.

None of the numbers in the metrics report on the City's website are broken down by month. All of the placement data is cumulative from the start of the program in June 2023. SPLA doesn't report housing referral by type as required. Further, obtaining an exception to the reporting requirements needs City approval in writing. Any change to the performance requirements of a contract requires a change order. I didn't see one in the contract file online, nor any other document releasing SPLA from its duty to report monthly service statistics. SPLA is not meeting its contractual reporting requirement and it appears the City is not enforcing the requirement.

I could not find any mention of how many spaces are in the lot. The only reason I can think of to not include a number is if they want to keep a certain difference between vehicles, so the total number would depend on how big each vehicle is. Its interesting that SPLA's narrative on the City's performance website mentions the lots are generally underutilized and there's plenty of room to open car doors at night for air. If they don't report the number of spaces versus usage, there is no way to tell if the lot is being used to maximum benefit.

You can infer the lot's use by its size and usage reported by SPLA. LAWA says the site is 2.79 acres, or a little more than 121,000 square feet. Deducting 20% for support facilities (bathrooms, laundry, office, etc.) nets 97,225 square feet. SPLA's performance report says there were 59 unique vehicles parked in the lot throughout the service period. If we generously assume all 59 were there on the same night, that's 1,647 square feet per vehicle, about the size of a single-story three bedroom house.

There are no metrics for cost per vehicle or per person referred. Although not true outcome measures, these metrics could be helpful as simple cost/benefit indicators. Without precise cost and service numbers, it would be difficult to calculate a cost per client, but if we project current costs for a year at \$1,014,050 and use the 10 months of June through March to project the 21 clients housed, we get 24 clients per year. Dividing \$1,014,050 by 24 clients comes to \$42,250

per client. Using the same projection for the 59 reported vehicles, comes out to 71 vehicles per year. At \$1,104,050, that would be \$14,280 per vehicle—but remember that’s not an annual cost because vehicles can only stay in three-night intervals, and there is no data on how many days each of those 59 vehicles were allowed to stay.

Based on the available information, I would make the following recommendations:

1. The City should enforce the contractual requirements for monthly data submission
2. Billings should be tied only to the services rendered in a billing period.
3. The number of days unique vehicles use the lot would be a helpful indicator of utilization.
4. Program updates should match the billing period.
5. Contracts should be for regular 12-month periods to make cost calculations easier.
6. It is very difficult to find all the related contracts in the City’s contract database because Safe Parking LA is also known as Community Partners. Further, there is no consistent data entry format, so the contracts can be under several different variations, such as Safe Parking LA, Safe Parking Los Angeles, Community Partners/Safe Parking, etc. The City should enforce consistent data entry rules to make finding all contracts easier.

Exhibit C

Inside Safe Performance Jan-April 2024

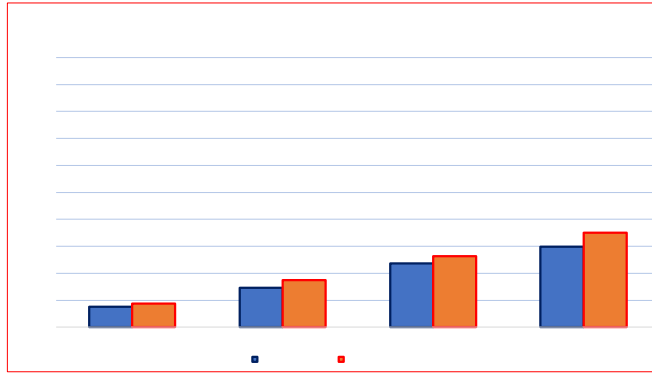
Program Overview

- Inside Safe is a Rapid Rehousing program that gets unsheltered PEH off the streets and into temporary housing as quickly as possible.
- The City rents hotel and motel rooms at several locations so people can be close to work or support services.
- While housed, residents are provided wrap-around services tailored to their needs.

Program Budget and Goals

- Annual Budget: \$255,000,000 from the City's General Fund/ Additional Homeless Services - General City Purposes account
- YTD Expenditures: \$135,000,000
- Goal One: Provide temporary housing to 21,000 individuals this year.
- Goal Two: Place 60% of participants in permanent housing within six months

Program Performance at a Glance



For more program performance details, [click here](#).

Commented [LAAHR1]: Readers would click links like this to access more details, like where people were housed, how long, etc.

Latest Program Highlights

- Completed agreement for XYZ hotel in CD-11, adding 40 new rooms
- Moved 34 residents from temporary to permanent housing:
 - 20 went to Permanent Supportive Housing
 - 14 went to subsidized housing

Commented [LAAHR2]: Link to agreement with services and costs

Commented [LAAHR3]: Link to detail about what PSH facilities were used, current outcomes, etc.