

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN RIGHTS,
et al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, a Municipal
entity, et al.,

Defendant.

CASE NO. 2:20-cv-02291 DOC (KES)

Honorable David O. Carter,
United States District Judge

**DATA MONITOR NARDELLO &
CO. LLC'S QUARTERLY REPORT**

Pursuant to Section 7.2 of the Settlement Agreement between LA Alliance for Human Rights et al. and the City of Los Angeles ([Dkt. 421](#)), and the Joint Stipulation Seeking Approval of Agreement Regarding Disputes Relating to the 2022 Settlement Agreement ([Dkt. 1252](#)), Data Monitor Nardello & Co. LLC respectfully submits this quarterly report.

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DATA MONITOR'S QUARTERLY REPORT

September 30, 2026



Nardello & Co. LLC has made its best effort to ensure the accuracy of the information contained herein. The information contained herein: (i) may be modified with additional information; and (ii) does not constitute a legal opinion on any of the matters discussed herein. This report is subject to an indemnity agreement pursuant to the terms of the Professional Services Agreement between the City of Los Angeles and Nardello & Co. LLC.



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1. INTRODUCTION

On May 8, 2026, Nardello & Co. LLC was appointed by the Honorable David O. Carter, United States District Judge for the Central District of California, to serve as the data monitor under Section 7.2 of the Settlement Agreement between Plaintiffs LA Alliance for Human Rights, Joseph Burk, Harry Tashdjian, Wenzial Jarrell, Karyn Pinsky, Charles Malow, Charles Van Scoy, George Frem, and Leandro Suarez (“Plaintiffs”); and Defendant City of Los Angeles (“City”) (“2022 Settlement Agreement”; [Dkt. 421-1](#)), and pursuant to the Joint Stipulation Seeking Approval of Agreement Regarding Disputes Relating to the 2022 Settlement Agreement (“2026 Agreement”) ([Dkt. 1252](#)) between Plaintiffs, the City, and Intervenor CANGRESS and LA Catholic Worker (collectively “Intervenor”; together with the City and Plaintiffs, the “Parties”).

As the data monitor, Nardello & Co.’s objective is to review and verify the data contained in the City’s quarterly reports filed pursuant to the 2022 Settlement Agreement, which are based on information provided by various City agencies to the Office of the City Administrative Officer, the office that prepares quarterly reports for the City. To verify that the information contained in the quarterly report is accurate, the Monitor’s scope includes reviewing any relevant documentation and raw data that is sourced in any City department.

The sections that follow describe the scope and methodology of Nardello & Co.’s review, summarize its principal findings, and present information gathered through stakeholder meetings and interviews, site visits across the City’s 15 Council Districts, and open-source research. The report also analyzes the limitations affecting the available data, describes the reconciliation performed between the supporting materials provided to Nardello & Co. and the City’s reported figures, and addresses discrepancies identified in the data sources, definitions, and reporting processes reviewed by Nardello & Co.

Nardello & Co. appreciates the cooperation and assistance provided by the Court, Special Master Michele Martinez, counsel for the Parties, and all stakeholders who participated in this review. Nardello & Co. also recognizes and appreciates the efforts of the outreach workers, case managers, program staff, property management personnel, and others who work directly with persons experiencing homelessness (“PEH”) and who contributed information and assistance during this review.

2. DEFINED TERMS

- CAO – City Administrative Officer
- CD – Council District
- CES – Coordinated Entry System
- CHAMP – Comprehensive Health Accompaniment Management Platform
- City – The City of Los Angeles
- CoC – Continuum of Care Program, overseen by HUD
- County – The County of Los Angeles
- DHS – Los Angeles County Department of Health Services
- DMH – Los Angeles County Department of Mental Health
- HACLA – Housing Authority of the City of Los Angeles
- HAP - Housing Assistance Payment
- HIMS – Housing Information Management System
- HMIS – Homeless Management Information System
- HUD – US Department of Housing and Urban Development

- LAHD – Los Angeles Housing Department
- LAHSA – Los Angeles Homeless Services Authority
- PBV – Project-Based Voucher
- PEH – Persons Experiencing Homelessness
- PSH – Permanent Supportive Housing
- Settlement Agreement – The 2022 Settlement Agreement ([Dkt. 429](#))
- TLS – Time Limited Subsidy
- UHA – Universal Housing Application

3. SCOPE

In May 2022, Plaintiffs and the City entered into the 2022 Settlement Agreement ([Dkt. 429-1](#)), which the Court approved on June 14, 2022 ([Dkt. 445](#)). Section 7.2 of the 2022 Settlement Agreement provides that “[t]he Parties will engage a mutually agreed-upon third party to provide data collection, analysis, comments, and regular public reports on the City’s compliance with the terms of this Agreement.”

The Court additionally explained that the third-party Monitor:

- will ‘at least be’ responsible for reviewing and verifying the [C]ity’s data prior to publication, resolving data issues, and providing public reports on data compliance;
- will have full access to the data the City uses to create its reports;
- shall review and provide guidance on public accessibility to the City’s contracts and invoices;
- will confirm that shelter or housing offers were made with respect to the encampment reductions.

[Dkt. 1048 at 2](#), citing [Dkt. 991 at 50, 54](#).

As part of the 2026 Agreement, approved by the Court on May 8, 2026, the Parties agreed to the proposed scope of work for the Monitor, which provides that the Monitor will be responsible for verifying the following information:

- a. The number of housing or shelter opportunities created or otherwise obtained;
- b. For each housing or shelter opportunity created or otherwise obtained, the address, the type (*i.e.*, permanent or interim), the open and occupiable date, the number of beds opened and how many remain open, Council District, number of units/beds, status (*i.e.*, open or in process), and the number of PEH served;
- c. For units that physically existed prior to the 2022 Settlement Agreement, the explanation of how the City created those units;
- d. The number of PEH moved into a housing or shelter solution created under the 2022 Settlement Agreement or the Roadmap Agreement during the period starting May 19, 2022 and ending June 30, 2027;
- e. Any other data the City reports in its Quarterly Reports pursuant to the 2022 Settlement Agreement or any other agreement with Plaintiffs.

[Dkt. 1252 at 17](#).

The proposed scope of work further states, in pertinent part:

2. The City will . . . provide to the Monitor the complete set of underlying data the City relied on for preparation of each quarterly report in the form the data was provided to CAO's office, which is the office that prepares the reports, on the date the report is filed with the Court.
3. The Monitor will review the data provided to the CAO's office to verify that the information contained in each quarterly report is accurate. The Monitor can review any relevant documentation and raw data that is sourced in any City department and to which the City has.
4. The Monitor shall not have direct access to any database, data system, or information system whether maintained by the City, LAHSA, and/or HACLA, absent a showing of extraordinary good cause that such direct access is necessary for the Monitor to perform his or her duties and that there are no less intrusive means to obtain the data.

Id. at 17-18.

Additionally, the scope of work contemplates up to 40 hours per quarter of field work, which can include observations of any Inside Safe or CARE+ operations, if the Monitor believes field work is necessary.

Id. at 18.

4. METHODOLOGY

Nardello & Co. employed a multi-source methodology designed to evaluate the processes by which the housing and shelter data reported by the City was recorded and maintained by its original source, and provided to and incorporated by the Office of the City Administrative Officer ("CAO's office"), and to assess the accuracy and reliability of the data. This methodology, detailed below, included review and analysis of the City's quarterly reports and the documents the City relied on for preparation of the report in the form the data was provided to the CAO's office; interviews and meetings with the CAO's office, relevant City agencies, housing authorities, service providers, and other stakeholders; demonstrations of applicable data systems using non-sensitive data; field work involving site visits across all 15 Council Districts; open-source research; and requests for additional records and explanations, as warranted.

The field work was necessary to independently verify information reported by the City and attributed to housing sites and to understand how site-level data is collected, maintained and transmitted to the CAO's office for the City's reporting purposes. These site visits also allowed the Nardello & Co. team to assess observable site conditions and speak with onsite personnel to supplement information reported through City housing data and other project documentation. Site visits were not intended to serve as operational audits or comprehensive evaluations of any particular site or service provider, but rather as one component of a broader effort to understand housing inventory and occupancy, project status, and data collection trends across the housing and shelter solutions referenced in the City's quarterly reports.



Nardello & Co. selected a geographically and programmatically varied sample of site locations across all 15 Council Districts, prioritizing sites with material changes or anomalies in reported status, unit/beds, or PEH served, based on the following criteria:

- Newly opened sites with low initial number of PEH served
- Partial openings/in progress sites
- Large number of PEH served increases at existing open sites
- Newly opened sites with material PEH served counts
- Decline in the number of PEH served
- Reductions in unit/beds
- Low number of PEH served relative to unit/beds
- Sites opened early in the settlement agreement

At each site, the Nardello & Co. team used a standardized protocol and documentation process designed to promote consistency across observations. Site visits generally included visual observation of the property and surrounding area, documentation of observable conditions, and collection of information relevant to the site's apparent operational status and physical condition. Where appropriate, Nardello & Co. spoke with available site representatives to obtain available information regarding site operations, occupancy and vacancy counts, record keeping practices, and the reporting pathways and systems supporting the City's data.

Nardello & Co. supplemented site observations with a review of publicly available information, including publicly accessible records, media reporting, government sources, and other open-source information. This review was used to provide additional context regarding project development, construction status, operational history, issues affecting occupancy or habitability, and other matters relevant to understanding observed site conditions. Open-source information was considered alongside, and not as a substitute for, information obtained through site visits and reported housing data.

Findings derived from site visits reflect conditions observed at the time of each visit. Nardello & Co. recognizes that site conditions, occupancy levels, operational practices and project status may change over time. Accordingly, observations should be interpreted as a point-in-time assessment and considered together with other information reviewed as part of the monitoring process.

Nardello & Co. followed up with the relevant City agencies, housing authorities, and service providers to obtain additional or clarifying information, as needed.

Nardello & Co. compared information obtained from these sources to assess whether the reported data was accurate, complete, and traceable to its original source and to identify corroborating evidence, inconsistencies, gaps, and limitations. Because Nardello & Co. was not provided direct access to the relevant databases or underlying raw data, its review was necessarily based on the available records, stakeholder representations, field observations, and the cross-source reconciliation procedures described below.

To minimize the potential for public disruption at operating housing sites, protect the privacy of site personnel, service providers, and residents interviewed as part of this review, and to encourage continued cooperation and candor during the monitorship, Nardello & Co. has elected to anonymize



the locations of site visits and the identities of those interviewed. Nardello & Co. will provide that information directly to the Court, Special Master, and the Parties upon request.

Data Sources Reviewed

In connection with the City's Quarterly Status Report Pursuant to the 2022 Settlement Agreement filed on July 30, 2026, Nardello & Co. received a password-protected ZIP file containing the following documents the City relied on for preparation of this quarterly report in the form the data was provided to the CAO's office:

- City's Final Quarterly Report under MOU.pdf
- Alliance FY25-26 Q4 Intervention Data Report_LAHSA - FINAL V7 - 2026_7_29.xlsx
- City of Los Angeles Mail - Fwd_ 1933 Magnolia Ave - Status.pdf
- Communication re Horizon Inn Demobilization.png
- DRAFT LAHD PSH_ Homekey - Open_ Occupiable_ as of June 30, 2026.xlsx
- Email re DV Shelter Data.pdf
- Email re Master Lease Sites.pdf
- HAP Contract Data Request _FY 25-26 Q4 HACLA Updates_ additional request 2026.07.21.xlsx
- Jordan Downs Phase S4 Data Request _FY 25-26 Q4.xlsx
- PHK 1 Data Request _FY 25-26 Q4.xlsx
- PHK 2 and PHK 3 Data Request _FY 25-26 Q4.xlsx
- PMP Updates *June 2026* DGS Emergency Stabilization Beds.pdf

Nardello & Co. requested and received the following additional data from counsel for the City:

- List of Interim Housing and street outreach service providers
- List of data systems for the information provided by the City and the owner or administrator of each system
- Samples of documentation used by LAHD for the submission of data to the CAO
- Data requests and response templates sent by the CAO to LAHSA, HACLA, LAHD, and CIFD in connection with the FY 2025-26 Q4 Quarterly Report¹
- Completed response templates LAHSA provided the CAO for the Q4 FY 2024-25 and Q1-Q3 FY 2025-26 Quarterly Reports
- HMIS Training and Guidance Materials List
- LAHSA's Quarterly Alliance Reporting Methodology
- Explanation for changes in unit/bed counts for certain Roadmap sites included by the City in the FY 2025-26 Q4 Quarterly Report
- LAHD's Master Report re: Homekey Sites, as of August 25, 2026

¹ The quarterly references are based on the City's fiscal year calendar, which runs from July through June. Accordingly, the quarter ending June 30, 2026 is referred to as FY 2025-26 Q4.



- HACLA's spreadsheet re: PBV Leasing as of June 30, 2026

Nardello & Co. also requested and received the following additional data from service providers:

- List of LA County shelter sites operated by a service provider, identified for the purpose of this report as Service Provider 1
- List of sites served by a service provider, identified for the purpose of this report as Service Provider 2, included under the Settlement Agreement
- Email correspondence between Service Provider 2 and LAHSA regarding the HMIS inventory module

5. KEY FINDINGS

- Representatives from LAHSA, the Mayor's office, HACLA, and LAHD indicated that the accuracy and quality of reported information depends significantly on data entered and reported, sometimes manually, by service providers. Based on interviews conducted during this review, Nardello & Co. could not identify routine site-level verification processes used to confirm provider-reported information.
- Nardello & Co. identified differing descriptions of the processes used to identify, track, and report Inside Safe participants. The CAO's office described a planned reporting component based on offers, acceptances, and rejections during Inside Safe operations, potentially based on lists of individuals expected to be housed. By contrast, a representative of the Mayor's office said that the Inside Safe team does not provide information directly to the CAO's office, and described a "tent-to-person" process focused on individuals present during an operation rather than the "by-name" lists referenced in the 2026 Agreement.
- LAHSA stated that it no longer maintains the encampment data reflected in Exhibit E of the City's quarterly report for FY 2025-26 Q4 and that the data should not be considered current or reliable. According to LAHSA, responsibility for the data transferred to the County on July 1, 2026, but the County had not agreed to maintain or track the information. Nardello & Co. could not verify the County's data maintenance practices.
- LAHD reported data quality and reporting control problems, including incorrect or missing HIMS property numbers, changing reporting requirements, and at least one required field that was mistakenly designated as optional due to an information technology communication error.
- HACLA representatives described a reporting process that relies on information from multiple departments and data systems but were unable to explain how that information is consolidated before submission to the CAO's office.
- Nardello & Co. identified a decentralized reporting environment in which information is maintained across multiple databases, platforms, and reporting tools without an identified centralized process for cross-agency reconciliation or validation. While some service providers reported conducting their own cross-system reconciliation efforts, Nardello & Co. could not identify a routine process for integrating and validating information across agencies or systems.

- Interviews identified inconsistencies in how key reporting concepts are defined and applied across agencies, service providers, and sites. Stakeholders described differing interpretations of terms such as “served,” and varying approaches to tracking and reporting participant activity, occupancy, referrals, and engagement.
- Interviews identified differing descriptions of reporting responsibilities and reporting pathways across service providers and property management personnel. Stakeholders identified differing individuals as responsible for reporting information and provided differing descriptions of how information is collected, transmitted, and reported.
- LAHSA described ongoing efforts to reconstruct and track Inside Safe data at the individual bed level and retrospectively assign participants to inventory records for prior periods. However, Nardello & Co. identified challenges associated with retrospective data reconstruction, including backdated participant assignments, unavailable inventory records, and historical participant information maintained outside HMIS.
- LAHSA stated that participant counts are not fully deduplicated across all reporting periods and program categories. While counts can be deduplicated within certain reporting periods using HMIS identification numbers, as participants move between outreach, Interim Housing, and PSH, they may be counted in multiple CD locations, and quarterly reports.
- The discrepancies between the figures contained in the agencies’ reporting templates provided to the CAO’s office and the figures contained in the City’s quarterly report for FY 2025-26 Q2 are relatively small in the context of the data reported for 279 sites. It appears, however, that the CAO’s office largely copied the numbers from the reporting templates. Given that the reporting templates are compiled from self-reported information from property managers and service providers, this information cannot be independently verified.

6. MEETINGS AND INTERVIEWS

Between May and September 2026, Nardello & Co. conducted 14 in-person, virtual, and telephonic interviews and meetings with representatives from the CAO’s office, LAHSA, LAHD, HACLA, the Mayor’s Office, and several organizations that provide services for PEH. The summaries below are neither transcripts nor verbatim accounts of those interviews and meetings; rather, they reflect Nardello & Co.’s understanding of the information relevant to its review.

Office of the City Administrative Officer – In May 2026, shortly after being appointed independent data monitor, Nardello & Co. met with the Office of the CAO.

- **May 19, 2026:** The CAO’s representatives explained in pertinent part that the quarterly reporting process begins with preparation of an Intervention Data Report, which tracks programs and housing interventions, created to satisfy obligations under the settlement. According to the representatives, information for the report is gathered from multiple agencies, including LAHD, HACLA, LAHSA, Inside Safe program operations, and Homekey-funded projects.

Regarding LAHD’s reporting of PSH project information – including unit counts, project status, occupancy levels, and the number of people served – the CAO’s representatives

stated that LAHD collects information from property managers by using a form, which the representatives understood to be electronic. The CAO's office then provides LAHD a spreadsheet that identifies the information it needs to complete the City's quarterly report.

The CAO's representatives stated that HACLA provides unit counts, addresses, project status and occupancy information through spreadsheets exchanged with the CAO's office. According to the representatives, this information is derived largely from HAP contract records. Because HAP records are tied to payments, however, they may not reflect current occupancy levels. The CAO's office uses those records to compare figures and assess their reasonableness. The representatives stated that future quarterly reports would include vacancy information provided by HACLA.

Regarding the tracking of Inside Safe housing inventory, the CAO's representatives stated that each hotel or motel's "open and occupiable" date is based on the date of its first invoice and that the CAO's office maintains these records. The reported room counts vary depending on whether a site operates under an occupancy agreement or a booking agreement. Although the reporting format remains under development, the CAO's representatives intend to work with the Mayor's office to obtain information about offers of shelter and housing made during each Inside Safe operation based on lists of individuals expected to be housed through each operation.

According to the CAO's representatives, LAHSA reports information concerning master lease sites and individuals served in Interim Housing, with the exception of information about one site that serves survivors of domestic violence. The representatives explained that participating service providers enter the underlying information into LAHSA's HMIS. LAHSA generates reports from HMIS and provides them to the CAO's office using a Microsoft Excel reporting template. The representatives stated the quality of the reported data depends substantially on the data-entry practices of the participating organizations.

LAHSA – Between June and September 2026, Nardello & Co. met with LAHSA on four occasions.

- **June 1, 2026:** The meeting focused on how LAHSA collects, maintains, and reports information included in the City's reporting, with an emphasis on the information in HMIS, which LAHSA described as the primary system used to track participant-level data for homelessness services programs in Los Angeles County. According to LAHSA, HMIS supports approximately 8,000 users across roughly 350 agencies and contains approximately one million individual profiles. Service providers enter information into HMIS, and such information is used for reporting, analysis, mapping, and program oversight. LAHSA stated that the standard operating procedures it has established, as well as the training modules it uses to guide data entry and data quality practices, address how service providers should record information and how data should be extracted and reported.

Regarding Inside Safe and Interim Housing reporting, LAHSA stated that Inside Safe sites were being configured at the individual-bed level in HMIS to enable more precise tracking of occupancy and participant placement. According to LAHSA, some sites had historically been configured at the broader unit or program level, which created challenges in accurately reporting the number of individuals housed at each location. LAHSA stated that participants are tracked through both encampment-resolution activities and Interim Housing enrollments, and that reporting accuracy depends on proper site configuration and

data entry practices. LAHSA identified June 15, 2026 as the target date for completing certain bed-level configurations.

The meeting also addressed time-limited subsidies, which LAHSA described as generally supporting scattered-site housing across the county. The reporting requirements and tracking mechanisms for these arrangements differ from those for bed-based programs,

Regarding permanent housing and master leasing, LAHSA described a complex reporting environment involving multiple funding streams and program types, including master leasing, vouchers, veteran housing resources, and flexible subsidy programs. LAHSA described master leasing as a unit-acquisition strategy under which agencies may lease entire buildings while participant rents are supported through different programs. LAHSA stated that master leasing was expected to shift to Los Angeles County, but did not specify a timeline. LAHSA identified AppFolio as a principal property-management database for certain master-leased units. According to LAHSA, reporting is more complex when building ownership, rental payments, and participant services are funded through different mechanisms and administered by different organizations.

The group reviewed LAHSA's CES, which LAHSA described as a HUD-related process used to assess and prioritize individuals for housing opportunities. LAHSA explained that CES and HMIS provide visibility into certain housing placements, but reporting limitations may arise when only a portion of a building or program participates in reporting pathways captured by those systems. As a result, occupancy and housing outcomes may be only partially reflected for some properties. For example, if half of a building is filled through CES and the other half through a US Department of Veterans Affairs program, the reporting may capture only the portion reported via the relevant HMIS or CES pathway.

LAHSA defined an encampment as a group of five or more people in the same general location for at least two weeks. According to LAHSA, street outreach workers record information concerning living situations, encampment status, outreach activities, referrals, and housing placements. LAHSA stated that the responsibility for managing the outreach function, as well as most outreach funding, was expected to transition to the County on July 1, 2026.

- **July 7, 2026:** Using non-sensitive training data consisting of fictitious participant profiles, LAHSA demonstrated selected HMIS functions, including the process for creating a participant profile.

In demonstrating the HMIS functions used to track encampments, LAHSA showed how HMIS displays encampments on a cluster map. Users who select an encampment can view a list of the individuals registered in HMIS who are associated with that location. LAHSA explained that encampment status moves from "Known Encampment," to "Planned Operation," "Active Closure Operation," "Closed/Active Maintenance," and, finally, "Closed/No maintenance."

LAHSA stated that responsibility for outreach and encampment management had shifted from LAHSA to the County. LAHSA said it remains responsible for reporting, while County staff perform outreach activities and enter encampment data.



According to LAHSA, HMIS contains approximately 2,000 to 3,000 data fields, and HMIS users have access to Looker to create reports. LAHSA stated that it uses Looker to extract data from HMIS into Tableau Prep, where reports are prepared, then uses a Tableau dashboard to display those reports.

LAHSA told Nardello & Co. that it defines engagement with a PEH as “an interactive client relationship resulting in a deliberate client assessment or beginning of a case plan.” According to LAHSA, an individual should no longer be classified as engaged if no interaction occurs within a 90-day period. LAHSA further stated that engaged individuals are deduplicated using an identifier assigned in HMIS, although duplicate profiles may still occur despite efforts to identify and merge them.

LAHSA outlined the referral process for Interim Housing as beginning when an outreach team member assesses an individual and adds the assessment to LAHSA and County queues for review. Matching teams review inventory and match participants to beds or units. The service provider completes enrollment and finalizes intake. Participants generally have 24 hours to accept a bed assignment and, after accepting, an additional 48 hours to appear for intake. LAHSA noted that, as a result, filling an available bed may take several days.

LAHSA stated Master Leasing operates largely outside HMIS. LAHSA identified AppFolio as the principal platform used to maintain data concerning master leased units. Reporting for master leased sites is more challenging, LAHSA explained, because bed-level information is not consistently maintained, making it difficult to reconcile occupancy and inventory data.

According to LAHSA, the PSH Community Queue matches participants with available housing resources, while the CES Policy Council establishes participant-prioritization criteria. For Project Based PSH, participants are prioritized based on their proximity to the property. LAHSA explained that, to receive PSH, a participant must respond to contact and possess the documentation required to proceed with placement.

- **August 28, 2026:** LAHSA’s head of the data analytics team explained that LAHSA uses different data validation processes depending on program type. HMIS operates under a data monitoring plan approved by the Continuum of Care Board and includes a “robust set of warnings and errors flagged across every program in HMIS.” Case managers are expected to enter and update information in HMIS within 48 hours, or two business days. Another LAHSA representative stated that a five-person team reviews large-scale data quality errors for analytical purposes and that a separate data integrity team reports to the head of analytics. A LAHSA analyst added that the organization maintains a data quality dashboard tracking the “top 10 issues,” which enables LAHSA to adjust workflows in response to recurring problems without changing the underlying validation logic.

According to the head of the data analytics team, matchers review bed availability information each day for Interim Housing placements and use HMIS data to refer PEH to available beds or units. LAHSA maintains a Resource Management System containing PSH information used in the Coordinated Entry System. She said she did not know how data is collected for Safe Parking sites, and referred Nardello & Co. to LAHSA’s Programs Team. LAHSA representatives stated that the organization’s formal validation procedures are described in its Data Quality Monitoring Plan.

Regarding operational oversight and site monitoring, the Head of the data analytics team said that LAHSA's active system management activities for Interim Housing include site visits. She said she did not know how often such visits were made, and referred Nardello & Co. to LAHSA's Programs Team.

According to the head of the data analytics team, a PEH is counted as "served" only if the individual is enrolled in a program, assigned to a bed, and spends at least one night at the site. An individual who resides in both an Interim Housing program and a PSH site during the same reporting period may be counted at both locations, which LAHSA does not necessarily consider to be duplicate reporting because individuals commonly progress through multiple stages of the homelessness response system, from outreach to Interim Housing, time-limited subsidy programs, and, ultimately, permanent housing. Participant-level data can be deduplicated using HMIS identification numbers, she noted.

LAHSA's HMIS team described its reporting and quality-assurance processes. When asked how data is reviewed before submission to the CAO's office, the head of the data analytics team stated that validation, active system management, and data-quality monitoring occur continuously. Service providers routinely generate data quality reports and LAHSA's active system management teams intervene when providers repeatedly enter information that does not meet applicable data quality standards.

According to an analyst on the HMIS team, the service provider list provided to Nardello & Co. reflected data as of June 30, 2026, although the head of the data analytics team noted that portions of the list may have been compiled earlier. When asked why service provider Home at Last ("HAL") remained on the list despite a June 2026 press release concerning LAHSA's termination of contracts with that organization, the head of the data analytics team explained that HAL remained on outreach provider lists because it continued to provide outreach services. Questions concerning the monitoring and accuracy of service provider data should be directed to grant administrators, she said, adding that the frequency of provider audits varies by funding source and program.

According to LAHSA representatives, Field Intervention Team ("FIT") personnel do not enter information directly into HMIS. Instead, FIT teams prepare by-name lists of individuals they seek to house and provide those lists to LAHSA, which enrolls the individuals in an encampment program. Encampment resolutions typically occur on Thursdays. The next day, LAHSA meets with FIT staff to review motel registries to confirm whether the individuals identified for placement were successfully housed.

- **September 4, 2026:** Nardello & Co.'s fourth meeting with LAHSA focused on the exhibits included in the City's quarterly report and the methodologies LAHSA used to generate the reported figures. The discussion addressed LAHSA's methods for tracking Interim Housing, outreach activities, referrals, vacancies, and encampment-related data, as well as the quality-control processes used to support reporting accuracy.

The team first discussed the Interim Housing tab as one of the oldest components of the quarterly report. LAHSA representatives stated that the CAO's office provides portions of the reporting template for the quarterly report. They explained that, after the Inventory Module became operational on January 8, 2025, individuals generally must be enrolled in a program and assigned to a bed to be counted as served; whereas enrollment may be the

only available criterion for programs established before implementation of the Inventory Module. Family programs are tracked at the household level, such that one bed assignment may allow all enrolled members of the household to be counted in HMIS.

The discussion also addressed historical data corrections and quality assurance within the IM. According to an analyst on LAHSA's HMIS team, retroactive quality-control efforts had applied only to Inside Safe data. The head of the data analytics team explained that service providers had been asked to assign participants to beds for historical periods dating to 2024 because the providers knew who had been enrolled at the time but had maintained the relevant bed assignment information outside of HMIS. When asked about the footnote in the Quarterly Report Intervention Data document ("Exhibit A") stating that data corrections had resulted in downward adjustments to the number of PEH served at 13 sites, she stated that reconciliation remained ongoing and that one unnamed provider had not yet completed the requested work. She further stated that service providers, the Mayor's Office, the CAO's office, and LAHSA's data quality team continued to reconcile data discrepancies. As a result, previously reported figures may be revised as corrections are made and reports rerun.

The newly added Interim Housing Entry exhibit, which contains deduplicated participant counts, captures enrollments occurring between the Roadmap/Alliance start and end dates and includes only individuals whose prior living situation was recorded in HMIS as "place not meant for habitation." LAHSA representatives explained that the participant counts provided to the CAO's office are deduplicated across all program enrollments within a single quarterly reporting period but are not deduplicated across quarters. Accordingly, an individual may be counted in more than one reporting period but is counted only once within any given quarter. LAHSA also described a six-month lookback methodology used to identify participants who had resided on Skid Row before entering Interim Housing. The representatives stated that the CAO's office was evaluating whether future reports should continue to present both deduplicated and non-deduplicated versions of these data.

According to LAHSA, the exhibit titled "Participants Engaged by Council District" measures outreach engagement rather than simple contacts or *ad hoc* service encounters. LAHSA explained that "engaged" reflects a higher level of interaction involving participant assessment, case planning, or efforts to secure shelter or permanent housing. Individuals may appear in more than one Council District if they are engaged in multiple locations, although citywide totals can be deduplicated using HMIS identifiers. According to LAHSA, the total participant count is deduplicated, and the "All Active and Engaged Participants" count includes the participants who became newly engaged during the reporting period.

According to the HMIS analyst, the exhibit titled "Number of Encampments in the City" reflects encampments recorded in HMIS as of the date the report is generated. The head of the data analytics team cautioned that the reliability of the exhibit depends on service providers entering accurate and current information into HMIS. She stated that LAHSA staff had previously coordinated with outreach teams to maintain encampment tracking data, but that responsibility shifted to the County on July 1, 2026. According to her, as the County had not agreed to maintain or track this information, the exhibit should not be regarded as accurate or current.



According to the head of the data analytics team, the referral process applies to all City-funded Interim Housing sites, not only those covered by the Alliance Settlement Agreement. LAHSA explained the process begins when an individual enters an HMIS queue and is matched to an available bed or unit. After a match is made, the participant's care team receives an email directing it to schedule an intake appointment. If the participant appears at the site, the service provider completes the intake, enrollment, and bed-assignment processes. LAHSA stated that the total referral count represents deduplicated invitations to enter Interim Housing. A referral may be classified as declined if the participant refuses the placement, does not appear for intake, or otherwise does not complete the placement process.

According to LAHSA, an individual must be actively enrolled in a program and have completed an assessment before entering the PSH queue. After a participant is matched to housing, the participant receives an invitation to complete a UHA, which is reported as an "offer made." Submission of a completed UHA is reported as acceptance of the offer.

Regarding the exhibit titled "Number of Shelter and Housing Vacancies," Interim Housing vacancies include beds that are available, unoccupied, and not associated with a pending placement, according to LAHSA. Vacancy totals include beds temporarily unavailable because of maintenance or repairs. PSH vacancy information is drawn from the Resource Management System rather than HMIS. Service providers or personnel from the Housing Services and Shelter team generally enter status updates, with the latter entering the most updates.

HACLA – Nardello & Co. had two meetings with HACLA, in July 2026 and September 2026.

- **July 2, 2026:** The meeting focused on understanding HACLA's processes for collecting, maintaining, and reporting housing-related data that informs the City's quarterly reporting. HACLA representatives described the role of their internal data systems, the types of information maintained by the agency, and the processes used to provide information to external stakeholders. The discussion also addressed HACLA's coordination with the City, the CAO, LAHSA, and project-based housing providers, including the exchange of information and reporting responsibilities among these entities.

According to a HACLA program officer, HACLA uses the Yardi platform to maintain records for program applicants and participants. HACLA representatives stated that the system contains detailed participant information used to determine their eligibility for housing programs, including lease data, rental subsidy records, and other personally identifiable information. HACLA explained that access to the system is restricted through role-based permissions due to the sensitive nature of the information it contains. According to HACLA, approximately 700 employees have some level of access to Yardi, with permission levels varying based on job responsibilities.

With respect to the information HACLA provides to external stakeholders and the processes for generating that information, the program officer stated that HACLA generally provides aggregate or summation data to the CAO's office and does not share client-level information, explaining that "we don't provide client level data because they don't have the right to that information." HACLA described its reporting process as operating on a monthly cycle, during which staff review activity from the previous month and generate summary reports that may include the number of individuals housed, the

programs under which they were housed, total units in a building, and occupancy and vacancy figures. HACLA stated that the information it provides is generated from the Yardi system and that external entities, including the City and the CAO's office, do not have direct access to the database. Instead, according to HACLA, external stakeholders submit requests for specific information, and HACLA generates and provides the corresponding reports.

According to a HACLA program officer, in responding to information requests from the CAO's office, multiple teams are involved in generating reports, including a staff member responsible for preparing summaries related to PSH and project-based housing developments. When asked what information is incorporated into the City's quarterly reports, a HACLA attorney stated that as HACLA provides various reports to the City, it is therefore unable to identify the specific datasets included in the final reports. He explained that information may be provided by three HACLA departments: the assisted housing services department; the asset management department; and the asset development department. HACLA representatives noted that, while the assisted housing services department has historically supplied the relevant information, they only recently became aware that the City may also receive information from the asset management and asset development departments.

Regarding the reporting templates shared by HACLA and the CAO's office, HACLA representatives stated that they did not know if information from different departments is submitted through separate reporting templates or a single consolidated template. A HACLA attorney said that when the CAO's office provides a spreadsheet requesting information related to buildings, vouchers, and subsidies, a HACLA analyst completes it, populating the requested fields, including information regarding occupied units. Much of the information provided to the CAO's office is aggregated and does not contain personally identifiable information.

According to HACLA, when applicants are referred through LAHSA's CES, HACLA works with service providers to complete the application.

HACLA representatives explained that the special programs team oversees PBV applications and assigns staff to specific developments to manage lease-up activity. Applications are submitted electronically through LAHSA's UHA process. Once a housing provider or developer clears an applicant, HACLA completes the application review and enrollment process, submitting a Form HUD-50058 (Family Report) and recording the placement as a move-in, which is used in calculating monthly lease-up figures. A HACLA program officer described an internal quality-control process through which staff review application materials and verify information such as the completion of background checks, income calculations, Social Security numbers, utility allowances, and other eligibility-related data before approval.

When asked whether HACLA maintains an auditable record for applications and housing placements, a HACLA program officer stated that the agency does not track the full lifecycle of an application, such as the time elapsed between application receipt and move-in. HACLA can generally identify when an application was assigned to a staff member and the associated target lease-up date. The program officer stated she did not know whether the system records the identity of users who make data-entry changes or maintains a record of when updates are entered.

According to a HACLA program officer, Yardi reports generally present program-level information, including unit allocations and unit counts, and can be filtered by property. Property managers notify HACLA when residents vacate units, but units may remain offline while repair, maintenance, or renovations are completed as the units must satisfy federal requirements before they can be leased. A program director explained that HACLA and LAHSA work directly with property managers to coordinate housing placements.

A project officer said HACLA did not draft the descriptions of homes converted to housing PEH included in Exhibit B. He added that the special programs team would likely be familiar with the reporting related to properties that use PBV, while information for properties that do not utilize project-based vouchers is likely kept by other HACLA departments.

- **September 9, 2026:** During Nardello & Co. second meeting with HACLA, a substantial portion of the discussion focused on how HACLA compiles, maintains, and reports project-level occupancy and leasing data, as well as the respective roles of the Assisted Housing Services (Section 8), Asset Development, and Asset Management Departments in those processes.

According to a HACLA attorney, information reported to the CAO's office is derived from multiple HACLA departments and data systems. Information related to Assisted Housing Services, *i.e.*, Section 8, is generated from Yardi utilization reports, while information related to Homekey properties is generally provided by the Asset Management Department. The attorney said he was not familiar with the processes used by the Asset Management Department to compile such information, but explained that both the Asset Management and Asset Development Departments provide information related to the Jordan Downs development and, to his understanding, receive information from the property management firms responsible for managing those properties.

The group discussed discrepancies between HAP contract effective dates and the "open and occupiable" dates reflected in City reporting, HACLA representatives stated that "open and occupiable" is not a term used by HACLA, which relies on HAP contract effective dates, *i.e.*, the point at which HACLA certifies that a property meets applicable program requirements and is eligible to participate in the voucher program. Differences between occupancy-related dates may occur when a property contains a mix of PBV and non-PBV units. HACLA said questions regarding the City's methodology used to calculate or report "open and occupiable" dates should be directed to the CAO's office.

A HACLA special programs officer stated that applications are reviewed for program eligibility, income qualifications, Social Security verification, and other program requirements before contracts are finalized. Assistant housing managers conduct quality-control reviews, while case teams continue to enter and update information throughout the lease-up process. Applications must pass multiple review stages before becoming eligible for voucher processing, with quality control checks conducted throughout the leasing process.

A HACLA special programs officer stated that corrections and amendments entered into the Yardi system are documented and that HACLA's information technology department would be the most appropriate source of Yardi audit logs and information relating to user



activity. However, HACLA representatives did not know whether HACLA could independently generate a comprehensive audit report reflecting the full history of system changes.

As Section 8 operations transitioned from the Elite system to Yardi in 2025, HACLA stated that reporting activities prior to the transition would have been conducted on the Elite platform. The special programs officer said she was not aware of the City's reporting obligations under the Settlement Agreement until the summer of 2025, although she understood that HACLA had been providing leasing reports to LAHD since late 2019. Based on her understanding, she could not determine whether HACLA had previously provided similar information to the CAO's office or whether such information had not been requested. A HACLA attorney stated that he did not know whether HACLA had received requests for this information from the CAO's office prior to that time.

After the meeting, City counsel told Nardello & Co. that the CAO's office has been collecting various data from HACLA for use in the quarterly reports for different periods of time.

For example:

The CAO has collected HAP contract effective dates from the Section 8 department since October 2023. Accordingly, projects with open and occupiable dates before July 2023 generally reflect the ready for occupancy date, while projects with open and occupiable dates after July 2023 generally reflect the HAP contract effective date, unless the ready for occupancy date is later.

The CAO has been collecting data regarding the Homekey 2 and 3 sites from HACLA's Asset Management Department starting with the quarterly report as of June 30, 2024, which was the first quarterly report when Homekey 3 sites were added to the City's reporting. Before then, LAHD would collect data for the Homekey 2 sites from HACLA, and report that data to the CAO. Data for Homekey 1 sites that had been Roadmap sites were included by the City as of the FY 2025-26 Q4 quarterly report, since that is when Roadmap sites could first be counted towards the City's reporting obligations pursuant to the 2026 Agreement.

The CAO has collected data regarding the Jordan Downs Phase S4 report from HACLA's Development Services Department starting with the quarterly report as of September 30, 2025, which was the first report after the site was added to the Alliance reporting.

LAHD – In August 2026, Nardello & Co. conducted three meetings with representatives of LAHD regarding the data, methodologies, and reporting processes associated with the City's quarterly reports.

- **August 13, 2026:** – Nardello & Co. met with LAHD representatives to discuss how the organization collects, verifies, maintains, and reports project occupancy information for purposes of the City's quarterly reporting. LAHD representatives explained that the data-collection process begins when the CAO's office identifies the projects for which updated information is needed. One representative stated that LAHD typically receives approximately two weeks' notice from the CAO's office to begin collecting and validating project data. Upon receiving a request, LAHD reviews the information submitted and works to resolve any identified discrepancies.

A member of LAHD's occupancy monitoring unit explained that she is responsible for collecting and reviewing information related to non-Homekey and non-AHSC – *i.e.*, Affordable Housing Sustainable Communities – projects and does not oversee data related to construction timelines, unit counts, or Homekey unit inventories. LAHD collects project information using an internally developed Google form that is distributed to property or site managers, and sometimes to compliance officers and regional managers. LAHD generally contacts at least two individuals associated with each property and asks that they coordinate and submit a single response, advising them that the information is being collected in connection with the City's reporting obligations under the Settlement Agreement.

According to another LAHD representative, common discrepancies identified during the review process can include differing interpretations of PSH unit definitions, inconsistencies in reported PSH unit counts, and instances in which reported occupancy and vacancy figures do not reconcile with the total number of units at a property.

Information collected is entered into an editable Google spreadsheet. A member of LAHD's occupancy monitoring unit explained that she generally attempts to preserve the submitted information and "tried not to make any changes apart from edits or strikethroughs." Asked if changes to the spreadsheet can be tracked, she said she understood that "as far as Google goes, I think Google captures that."

Project names and addresses may change, which creates problems in consistently identifying properties, the representative explained. Accordingly, LAHD provides property contacts with the applicable project identification number from HIMS, LAHD's internal database, and asks that the number be included with submissions. However, she noted that property contacts do not always consistently include the project number, which can occasionally complicate data tracking and reconciliation efforts.

According to the representative, the CAO's office has modified certain reporting fields from quarter to quarter. On one occasion, a miscommunication related to form configuration resulted in a field being incorrectly designated as optional rather than required. While the problem was corrected, some submissions did not contain responses to that field.

On a daily basis, LAHD staff reviews the data submitted by property contacts via the Google form, identifying potential discrepancies and following up with property contacts as needed. One representative estimated she corrects "about 90%" of the data before it is finalized. After the information is reviewed and any identified issues are resolved, the data is transferred to a separate document that is provided to the CAO's office. This transfer process, which involves data from approximately 90 to 100 properties, is performed manually, though LAHD is "trying to automate the process more." One LAHD representative said the information sent to the CAO's office is not cross-referenced against data maintained in HIMS.

A member of LAHD's occupancy monitoring unit stated that LAHD has been reporting occupancy data since the fourth quarter of 2023, with data initially collected via email and telephone calls. As the number of projects increased, LAHD developed a Google form to standardize and streamline data collection. The representative stated that the information provided to the CAO's office before implementation of the Google form likely exists



within various email communications. Another LAHD representative stated that, because information had been collected through multiple communication channels, the City directed LAHD to establish a more auditable data-collection process.

HIMS is the LAHD's primary system for managing housing projects. Project applications are submitted through the Universal Notice of Funding Availability system, but once funded, each project is transferred to the HIMS' project development module, which tracks project milestones, including construction progress and anticipated start dates. Because HIMS is capable of storing substantial amounts of project-related information, LAHD is developing a process to tag projects and facilitate the identification and reporting of projects included in the City's quarterly reporting.

One representative said LAHD is developing the Affordable Housing Information system, which is intended to serve as the next generation of HIMS, *i.e.*, HIMS 2.0. According to LAHD, the system is being integrated into the existing HIMS platform through the phased implementation of additional modules. LAHD predicts integration of the project development component by the end of the current fiscal year, with a subsequent phase focused on supporting the asset loan portfolio team anticipated during the next fiscal year.

HIMS contains information regarding a property's total unit count, including the number of PSH units, non-PSH units, and manager units. An LAHD representative said occupancy data is not tracked on an ongoing basis within HIMS because the system is used primarily to manage project development and loan-related activities. Occupancy-related information has historically been maintained on an annual basis by the Urban Futures Bond Administration, a contractor engaged by LAHD.

In a subsequent email, LAHD noted that "the individual at LAHD who manages the Urban Futures contract indicated that Urban Futures does not manage the occupancy data that was submitted for the quarterly report." Asked a follow-up question, LAHD explained: "[The representative], who manages the Urban Future contract, said that the Urban Futures contract is specific to monitoring rents and incomes on an annual basis, and that Urban Futures' annual monitoring process is different from the quarterly vacancy data. The vacancy data that was submitted for the quarterly report was collected by LAHD staff."

The discussion concluded with a review of the HHH Progress Dashboard published on LAHD's website. According to LAHD, the dashboard includes both projects funded by LAHD and projects in which LAHD has otherwise played a role; meaning the projects are "not a one-to-one match with the Alliance settlement." LAHD explained that the general manager's office periodically asks staff to review and update dashboard information to support tracking of project development activities. However, according to LAHD, the dashboard is not intended to function as an ongoing tool for monitoring project occupancy.

- **August 20, 2026:** Nardello & Co. met with two LAHD systems analysts to discuss the processes used to support the City's quarterly reporting. The analysts explained that quarterly reporting relies on information maintained in HIMS – project-level information, including funding sources, project status, completion status, and ready-for-occupancy dates – as well as data collected through email surveys completed by property managers. Project developers enter information into HIMS. LAHD case managers review and update the information as projects progress. HIMS data is used to compile project names, addresses,

and HIMS identification numbers, which, in turn, are used to generate email "survey" requests distributed to property managers.

When asked if HIMS contains contextual information regarding project performance – such as explanations for project delays or lower-than-expected occupancy levels – one analyst stated that the system captures a substantial amount of project-related information and that staff may, in some instances, enter comments about problems affecting project progress.

One of the analysts said LAHD information used for quarterly reporting is maintained in various repositories, primarily spreadsheets that serve as the foundation for the reporting process. Using a list maintained by the team of the managers associated with approximately 190 projects, LAHD then generates and sends surveys requests that are distributed to property managers for self-reporting. Each survey contains the project's name and HIMS identification number. Property managers are instructed to report the total number of available units and the number of available PSH units. Reported information is recorded in spreadsheets maintained by LAHD. According to the analysts, LAHD tracks the survey response rate and knows which property managers do not respond.

According to the analyst, LAHD is in the process of "automating" portions of the quarterly data-collection workflow, seeking to automatically distribute survey requests to properties on the reporting list, record responses as they are received, and identify for follow-up by management staff emails sent to invalid addresses or to individuals who are out of the office. The analyst noted that survey responses would be stored in a "database that could maintain integrity in ways that the current spreadsheets are not able to."

The discussion also addressed coordination between LAHD's management and systems team. One systems analyst said the systems team was not involved in the preparation of quarterly reports until the previous reporting cycle. When asked about quality control procedures designed to ensure the accuracy of data entered into the reporting process, the other analyst replied, "that's on the business side," indicating that he was not familiar with any quality-assurance procedures.

The discussion also addressed LAHD's role in preparing data for the City's quarterly reporting. One analyst stated that the systems team generates reports for program staff, who, in turn, provide information to the CAO's office. Shown a spreadsheet titled "DRAFT LAHD PSH_Homekey-Open_Occupiable_as of June 30 2026," which was identified as part of the data relied upon by the CAO in preparing the quarterly report, the analyst confirmed that the systems team provided the information reflected in the spreadsheet, which was derived from survey responses submitted by property managers. When asked about the source of the figures reflected in the spreadsheet, the analyst stated that the information was self-reported information by property managers.

The analyst stated that he had observed instances in which information maintained by LAHD differed from that reported by property managers. Responsibility for identifying and resolving such discrepancies rests with LAHD management analysts, he noted, as the systems team's role is limited to collecting information received through survey responses and providing that information to the management team for review and analysis.



Nardello & Co. requested copies of all documents and materials used in the collection and submission of data to the CAO for the City's July 30 quarterly report, including: the aforementioned Google form used to collect information and any prior versions, if applicable; the distribution list for the Google form; and all related responses and correspondence, including emails, messages, and notes. In response, Nardello & Co. received a limited set of documents in PDF format, including: a sample of the Google form; a "working copy" spreadsheet reflecting form responses that contained unexplained annotations; and a sample initial and reminder emails sent to property managers.

Nardello & Co. was informed that "LAHD does not currently have a manageable way of pulling correspondence with the property managers related to this request for information. LAHD is in the process of developing a separate email address that it can use for those communications."

- **August 27, 2026:** A staff member responsible for project Homekey-related reporting explained that, each quarter, she and a colleague receive from the CAO's office an Excel workbook with projects organized by funding source or program, and are asked to provide project-level information. Her responsibilities are limited to Homekey-funded projects. She and another LAHD employee review information concerning occupancy, occupied units, and vacancies, and update the workbook accordingly. As many Homekey projects are undergoing rehabilitation, she is responsible for monitoring their progress. Once rehabilitation is complete, responsibility for tracking occupancy and vacancy information transfers to LAHD's occupancy monitoring unit.

The group discussed how information related to Homekey project is collected and maintained within LAHD. She explained that, when responding to requests from the CAO's office, she relies primarily on information obtained through bi-weekly meetings with project developers, who provide updates regarding project completion status, occupancy and other project milestones. If she is unable to attend, project managers or other staff members provide her with relevant updates. When more current information is needed, she said, she contacts developers or property management representatives directly. She also receives project-related updates through email communications.

LAHD personnel assigned to individual projects maintain Microsoft Word documents that are project-tracking agendas, which include information obtained through discussions with developers and updates regarding project completion status, certificate of occupancy status, and lease-up progress, the staff member explained. Staff are expected to update project-specific agendas on a weekly basis as the information feeds into a master agenda maintained by LAHD that encompassing all projects. These agendas, together with information obtained during meetings with developers, are used to complete the reporting spreadsheets provided by the CAO's office, according to the staff member.

The discussion also addressed project status classifications and reporting practices. When asked about the designation "Open/In Process," the staff member stated that she was not familiar with it, but explained that, to her knowledge, projects are generally categorized as either "Under Construction" or "Complete." When occupancy or unit figures remain unchanged from a prior reporting period, she confirms that the previously reported figures remain current. Project managers are responsible for entering project information into HIMS, while a separate construction services unit monitors construction progress and status.

The discussion also addressed the allocation of responsibilities within LAHD for monitoring Homekey projects. Newly completed Homekey projects are transitioned to LAHD's occupancy monitoring unit. As of the date of her interview, the staff member was responsible for overseeing two properties, located at 19325 Londelius Street and 20205 Ventura Boulevard. Bi-weekly, she meets with representatives of those projects to obtain updated project information. Responsibility for monitoring other Homekey properties rests with the occupancy monitoring team.

With respect to data reliability and verification, the staff member, who incorporates information provided by developers and property management representatives into the quarterly spreadsheets submitted to the CAO's office, said she has no independent means of verifying the occupancy and project status information included in her reporting.

After the meeting, LAHD stated that the "master agenda," which is referred to as a Master Report, a live workbook that is updated by many staff throughout the City on a regular basis. As such, there are no historic copies available.

Other Stakeholders – Nardello & Co. interviewed representatives of several service providers and the Mayor's office to better understand the processes and data sources used in the City's quarterly reporting.

- **August 4, 2026 – SRO Housing:** Nardello & Co. met with a representative of Skid Row Outreach ("SRO") to discuss the organization's housing programs, housing placement processes, data systems, and reporting practices. SRO explained that many of the properties with which it is involved operate under multiple funding sources. For example, SRO stated the Ingraham Villas property includes 120 units serving PEH, of which 81 units are designated for DMH-supported housing and 39 units are operated as affordable housing by property management and leasing personnel. According to SRO, referrals for the DMH-funded units are made through DMH, while SRO provides supportive services to residents participating in those programs. As of August 4, 2026, Ingraham Villas had 28 vacant units, including 17 units that were ready for immediate occupancy and 11 units undergoing turnover preparation following recent move-outs, SRO stated. Some 20 of the vacant units had already been matched with prospective tenants and were in the process of being filled.

The conversation also included a detailed discussion of SRO's data systems and reporting processes. According to SRO, only DMH-supported units are reported through HMIS and CHAMP, while affordable housing units are tracked separately in Yardi, which SRO uses as its internal property management system. SRO stated that it manages approximately 32 properties and maintains affordable housing data on Yardi. Reporting requirements vary by funding source, with DMH- and DHS-funded programs reported in both HMIS and CHAMP, and LAHSA-funded units generally reported only in HMIS. The representative said SRO was not aware of any plans to transition away from HMIS or discontinue HMIS reporting.

According to the SRO representative, intensive case managers and case managers are primarily responsible for entering information into the web-based platforms HMIS and CHAMP; with case notes typically required to be entered within 24 hours of client contact. In addition, DHS-funded programs require periodic client reassessments and a minimum



level of case note documentation based on client acuity, while LAHSA's requirements focus on timely data entry rather than a prescribed number of monthly case notes.

Resident move-outs should be recorded in the applicable systems within 24 hours and reporting delays most commonly occur when recent move-outs have not yet been entered. To promote data accuracy, the representative explained that information is routinely cross-referenced among Yardi, HMIS, and CHAMP.

According to SRO, staff receive training on the organization's data systems, with the completion of required training documented in employee personnel files. Both HMIS and CHAMP provide their own training resources. While supplemental, "refresher" training is offered periodically; however, participation is not tracked through the same formal process used to document completion of required training.

According to the representative, the average housing match is completed within approximately three to four weeks, although the process may take longer when inspections are required. SRO stated that placement timelines have increased in recent months due to several factors, including internal processing changes among partner organizations, turnover at LAHSA and other housing agencies, and inspection-related requirements. Once a prospective resident is matched to a housing opportunity, SRO assigns a staff member to maintain weekly follow-up, assist with documentation requirements, and support the individual through the placement to reduce the risk of disengagement. Individuals enrolled in its housing programs are considered actively served for as long as they remain enrolled and residing within the program. According to the representative, individuals are no longer counted as actively served once they exit the program.

- **August 28, 2026 – PATH:** Nardello & Co. met with three members of the executive team of People Assisting the Homeless ("PATH") to discuss the organization's housing programs, funding sources, data systems and reporting practices. According to PATH's senior director of Interim Housing programs, the organization receives funding from LAHSA, the Los Angeles County Department of Homeless Services and Housing, and the City of Long Beach. PATH operates three Inside Safe programs – the Stuart Hotel, Hollywood Inn Express South, and Hotel Silver Lake – under a single LAHSA contract that supports 203 program slots across the three properties. PATH stated that all reporting associated with these 203 slots is completed through HMIS. PATH explained that it participates in recurring meetings with the CAO's office to address invoicing and operational matters affecting Inside Safe providers.

For sites operating under occupancy agreements, including the Stuart Hotel and Hollywood Inn Express South, PATH stated that occupancy information is jointly reviewed and verified by PATH and hotel management before being reported to the City. According to PATH, occupancy data is shared with the Mayor's office on a daily basis, while invoicing is conducted twice per month. PATH explained that vacancies and resident move-outs are entered into HMIS in real time rather than being updated in connection with invoicing cycles, as this approach enables the Mayor's office to identify available rooms and facilitate the timely placement of individuals into vacant units following encampment resolution operations.

PATH also outlined its enrollment and exit procedures. According to PATH, participants may be enrolled through coordinated encampment resolution operations involving LAHSA

or through direct referrals from the Mayor's office. PATH stated that, when a participant is believed to have exited a program, staff undertake a verification process before recording the exit in HMIS. The representative explained that this process may include outreach to the participant, emergency contacts, hospitals, and other relevant sources to determine whether the individual remains engaged with the program before the exit is formally recorded. PATH further stated that participants who transfer between programs are exited from one program and enrolled in another, with those transitions documented in HMIS. This procedure is intended to ensure that the participant enrollment and program status information is accurately reflected in the system.

Participants may be transferred between programs for a variety of reasons, including safety concerns, domestic violence related circumstances, medical needs, reasonable accommodation requests, or the need to access services in a different location. Individuals in a couple are enrolled separately and assigned individual beds to ensure that participation and occupancy information is accurately recorded.

PATH further explained that units temporarily taken offline for repairs or maintenance may continue to appear as vacant in certain reporting contexts. As a result, reported vacancy figures may not always reflect the number of units that are immediately available for occupancy.

According to PATH, as PEH served counts are cumulative, annual totals may exceed the number of individuals actively enrolled at any given time because participants may transition among multiple programs during the reporting period.

PATH said outreach staff may enter referrals directly into HMIS using mobile devices while in the field, although some staff complete data entry after returning to the office. PATH stated that shelter referrals are generally coordinated through HMIS, whereas Inside Safe placements are coordinated through the Mayor's office as part of encampment resolution efforts. Reporting and data-management practices may differ by funding source. According to PATH, scattered-site housing programs, including the property located at 1317 South Grand Avenue, may be tracked in either HMIS or CHAMP depending on the funding source associated with the program.

PATH stated it could not readily provide a site-specific snapshot of occupancy data as of June 30, 2026 because occupancy reporting for its Inside Safe program is aggregated across the organization's three Inside Safe sites rather than maintained or reported on a site-by-site basis. As a result, PATH indicated that occupancy information for a particular property could not be easily isolated for that reporting date.

- ***September 18, 2026 – Hope the Mission:*** Nardello & Co. met with representatives of Hope the Mission ("HTM") to discuss the organization's Interim Housing and Inside Safe programs, including its data collection practices, HMIS reporting procedures, occupancy tracking processes, and quality-control measures. The discussion focused on how HTM collects, maintains, and reports program data, as well as the controls and procedures used to support the accuracy of information reported to funding agencies and other stakeholders.

HTM explained that it operates more than 33 housing sites, including six Inside Safe sites, funded through a combination of City and County programs. According to HTM, participant referrals and housing matches are received primarily through LAHSA. Once a



referral is received, prospective participants complete an intake process and are enrolled into the appropriate program based on program eligibility and placement requirements.

HTM stated that case managers are responsible for entering participant enrollments and exits into HMIS, while onsite managers and data managers conduct daily reconciliations of occupancy information. HTM maintains a multi-layered quality assurance structure consisting of approximately 25 staff members, including data managers, data coordinators, and a director of data evaluation. The senior director of contracts and data explained that the team conducts weekly audits of both physical and electronic client files, identifies missing or incomplete documentation, and works with program staff to address identified deficiencies. HTM holds monthly meetings to review performance measures and discuss data quality problems.

The senior director of contracts and data explained that HTM maintains both electronic and physical client records, with client information, assessments, case notes, enrollments, exits, and services provided recorded in HMIS, while physical client files are retained at program sites. Attendance is tracked separately, through manual attendance records.

A vice president noted that as the organization's reporting obligations are directed to LAHSA and not to the City, HTM provides program and participant information to LAHSA in accordance with its contractual and reporting requirements but is generally not involved in, or aware of, how LAHSA compiles, analyzes or reports that information to the CAO's office or other City agencies.

One of the sites discussed during the meeting was an Interim Housing site in CD 6, an Inside Safe location. HTM explained that approximately half the rooms are occupied by Inside Safe participants, with the remaining rooms available to paying customers. Because the property operates as an Inside Safe site, decisions regarding participant placement and vacancy management are coordinated through the Mayor's office. HTM stated that its responsibilities are limited to providing supportive services, completing participant enrollments, and maintaining participant records. The property owner is not involved in day-to-day operation of the program; HTM is, and maintains staff onsite to manage program activities.

With respect to another site, an Interim Housing site in CD 2, HTM explained that participants are referred to the site through LAHSA. According to HTM, once a referral is received, case managers complete the intake process, assign participants to available beds, and connect them with case management services. HTM further stated that case managers are responsible for entering participant assessments, case notes, service information, and enrollment data into HMIS.

During Nardello & Co.'s August 31, 2026 visit to the aforementioned Interim Housing site in CD 2, an onsite staff member demonstrated how internally shared Google spreadsheet is used for program tracking. HTM maintains a separate spreadsheet to consolidate census and occupancy information. Onsite staff track attendance and bed assignments on a daily basis using manual rosters and compare those records to information maintained in HMIS to identify and resolve discrepancies. According to the senior director of contracts and data, the spreadsheet functions as a supplemental reconciliation tool intended to support the accuracy of occupancy and attendance information recorded in HMIS.

In discussing historical data correction efforts, HTM's senior director of contracts and data described ongoing work to reconcile historical information associated with certain Inside Safe programs. According to the senior director, HTM had been working with LAHSA to review attendance records, occupancy information, and historical billing records to identify and resolve discrepancies. He stated that LAHSA had requested manual attendance records as part of this review and motel invoices were also being examined to verify historical bed utilization figures. HTM and LAHSA have engaged in ongoing discussions and information-sharing regarding these reconciliation efforts.

- **September 23, 2026 – Mayor's Office:** The meeting focused on how the Mayor's office tracks occupancy information across Inside Safe sites. A senior director from the Mayor's office explained that her primary responsibility is supporting Council Office priorities related to encampment resolution efforts. She stated that she relies solely on a vacancy tracking report that identifies available rooms across the 41 Inside Safe sites. The underlying occupancy information is generally submitted on a weekly basis by property owner or managers through a Google form maintained by the Mayor's office. The form captures information such as the name of the site, the identity of the individual submitting the data, the number of available rooms, and contact information. Responses submitted through the Google form are collected electronically via email and used to generate occupancy and vacancy reports.

While the vacancy tracking process represents the Mayor's office's primary mechanism for monitoring current occupancy levels and communicating with property owners regarding available rooms, the information tracked reflects conditions at a point in time, meaning that, as room availability reported at the beginning of a reporting period may change before the next update is received, the Mayor's office may not become aware of those changes unless staff contact a property's owner or manager. She stated that the reported information is generally considered reliable, but it is not independently verified except in limited circumstances. Staff may periodically contact property owners or managers to confirm reported information, but the Mayor's office does not typically conduct site visits to verify occupancy data.

The discussion also addressed the relationship between occupancy data maintained by the Mayor's Office and reporting conducted through LAHSA. When asked how occupancy information collected through the Mayor's office is incorporated into LAHSA reporting processes, the senior director stated that she was not familiar with LAHSA's reporting methodology. She explained that LAHSA maintains its own reporting system, HMIS, to which her team does not have access. Counsel for the Mayor's office described the Google form used to collect occupancy information as a "hyper-internal tool for the Mayor's office" to support its operational needs. When asked whether all 41 Inside Safe sites are included in the City's reporting, she stated that she did not know.

The senior director stated that compiling information such as the number of housing or shelter offers made, accepted, and declined for the Inside Safe program can be challenging given the number of City programs and entities involved in coordinating services through LAHSA.

Regarding the by-name list referenced in paragraph 11(i) of the 2026 Agreement – "For the Inside Safe program specifically, the City will report the number of offers of shelter or housing made to PEH by using the 'byname' list typically created 2-4 days prior to an



Inside Safe operation.” – the senior director stated that multiple outreach teams and service providers may develop by-name lists as part of their operations. She explained, however, that her team focuses on identifying and engaging individuals at encampment locations in connection with an encampment resolution effort, or “tent to person.” rather than relying on a centralized by-name list.

The senior director said her team maintains a “triage list” to facilitate outreach and service coordination. Individuals not previously known to the team who request assistance are referred to LAHSA for assessment and assistance. LAHSA’s homeless engagement team conducts outreach at encampments, develops participant lists, and has access to relevant data systems and records, although she did not specify which systems or records. The senior director stated she was not familiar the “master list” of Inside Safe participants referenced in the City’s quarterly report.

The senior director stated that her team does not provide occupancy or programmatic information directly to the CAO’s office for purposes of the quarterly reporting. The only information her team transmits to the CAO’s office relates to room reservations and associated documentation for payment processing. To her knowledge, after receiving information from LAHSA, the CAO has not submitted follow-up questions to her team regarding Inside Safe data.

After the meeting, the CAO’s office confirmed through email that all 41 Inside Safe hotel and motel sites are included in the City’s quarterly reporting. The CAO further stated that data concerning these Inside Safe sites is entered into HMIS by the respective service providers and serves as the basis for reporting related to Inside Safe program operations.

7. SITE VISITS

Between July and September 2026, Nardello & Co. conducted 30 site visits to Interim Housing and PSH sites throughout the City of Los Angeles, including to sites located within each of the City’s 15 Council Districts.

Council District 1

- ***Permanent Supportive Housing site:*** Nardello & Co. selected this site for review based, in part, on FY 2025-26 Q3 reporting indicating 90 available units or beds and 72 PEH reported as served.

On July 23, 2026, Nardello & Co. interviewed an onsite case manager, who said the property, which opened in 2023, consists of seven floors with approximately 20 single-occupancy units per floor. The entire building is designated for PEH, although one floor is designated as “market rate” housing. The case manager further explaining that residents assigned to units are designated as DMH-supported housing must satisfy eligibility criteria. While unable to provide the number of occupied units at the time of the visit, or to explain the relationship between the site’s reported unit capacity and the number of PEH reported as served in the City’s quarterly reporting, the case manager said four vacant units had been matched with prospective residents who had not yet moved in.



The case manager stated that the property receives funding from DMH, DHS, and various contracts with other housing agencies. According to the case manager, staff maintain records in both HMIS and CHAMP, and retains hard-copy records on site.

- ***Interim Housing site:*** A staff member at the aforementioned PSH site in CD 1 identified this Interim Housing site as housing a substantial number of PEH. This site was also included in the review because City reporting reflected an increase in the number of PEH, from 774 in FY 2025-26 Q3 to 842 in FY 2025-26 Q4.

On September 3, 2026, Nardello & Co. interviewed an employee affiliated with the property management company overseeing this site, who said his responsibilities were limited to building operations and that he was not authorized to discuss the property's programs or service provider activities. He referred Nardello & Co. to the service provider responsible for managing the site's housing program.

- ***Permanent Supportive Housing site:*** Nardello & Co. selected this site for review because the reported data reflected a comparatively low number of PEH served relative to the number of available units/beds. Specifically, FY 2025–26 Q4 data showed 56 units/beds and 40 PEH served.

On September 3, 2026, Nardello & Co. spoke with a site supervisor, who stated that the building contains 57 units, including 56 PSH units and one unit reserved for the onsite manager. According to the supervisor, 17 units were vacant at the time of the interview, and vacancy information is maintained in Yardi.

The supervisor stated that while Yardi is intended to be updated daily, she has been updating the system weekly in the absence of the onsite manager, who is responsible for providing quarterly reporting data. She meets regularly with case managers from the site's service provider to review occupancy information.

The supervisor said while the building maintains an internal retention tracker, all site data is maintained in Yardi. She said she was not familiar with HMIS.

While unable to explain the property's historically high vacancy rate, the supervisor noted that most vacant units were associated with pending matches, adding that the matching process may be prolonged by missing documentation or appeals.

Explaining that quarterly reporting information is submitted via an LAHD online portal through which she submits all reporting information, the supervisor showed Nardello & Co. the portal's login screen, which bore the header "LAHD Code Enforcement Division." LAHD personnel contact her by email if clarification regarding a submission is required. When asked about the LAHD Google form for occupancy reporting, she stated that she was not familiar with the form and that she submits all reporting information through the portal.

Council District 2

- ***Permanent Supportive Housing site:*** Nardello & Co. selected this site for review because reported data reflected the largest quarter-over-quarter decline in PEH served, from 50 in



FY 2025-26 Q2 to 33 in FY 2025-2026 Q3, while the number of units/beds remained constant at 51 in both quarters.

On July 28, 2026, Nardello & Co. spoke with an onsite representative, a temporary employee of the property manager who said the property contains 103 units, 50 of which are designated for PEH. Of the 50, 47 were occupied at the time of the interview, she said. Referrals are received from LAHSA via CES, but, for a reason unknown to her, the property had not received a referral in approximately three months. When a unit becomes available, vacancy information is entered into "LAHSA's system," which the representative did not name. As a temporary employee, she does not have access to that system, so a manager has to process resident exits before units can be reflected as available and new referrals can be received, she said. The property did not have an onsite manager at the time of the visit and the assistant manager was attending training, she noted. She advised Nardello & Co. to contact the assistant property manager by email or telephone.

On the same day, Nardello & Co. also spoke with an onsite case manager with the service provider associated with this property. She said her supervisor is responsible for entering exit information into the CHAMP database, that data from HMIS is being manually transferred into CHAMP, and that she was not aware of any required completion date for that process. There is no deadline for a matched applicant to move into a unit, she said, but occupancy is contingent upon approval from HACLA.

- ***Interim Housing site:*** Nardello & Co selected this site for review because it was among the earliest sites to open during the Settlement Agreement period. According to FY 2025-26 Q4 data, the site had an open and occupiable date of April 13, 2021, and reported 200 units/beds and 248 PEH served.

On August 31, 2026, Nardello & Co. spoke with a lead manager and an assistant program manager affiliated with service provider associated with this property. The assistant program manager stated that 192 of the site's 198 beds were occupied at the time of the visit. While the site's capacity is 200 beds, one unit has been offline for several years due to fire damage, he noted. According to the assistant program manager, six of the homes contain one bed, while the remaining homes contain two beds each.

The assistant program manager showed Nardello & Co. a participant roster maintained in Google Sheets and stated that the document is updated daily. He noted that the site employs seven case managers and one program manager. According to the lead manager, only case managers and program managers have permission to edit the shared document: other staff members have view-only access. The lead manager explained that the roster is updated on an ongoing basis and includes participant names, HMIS identification numbers, gender, and assigned case manager. A separate file is maintained to track participant exits.

When asked about participant turnover, the assistant program manager was unable to estimate how many participants had permanently left the program because some individuals later return. One had exited and returned on four separate occasions.

The onsite managers stated that, in addition to the shared Google Sheets document, participant information is maintained in Clarity, which integrates data from HMIS, and to which LAHSA has access. According to the managers, case managers are responsible for



entering participant information upon arrival, while participant records are updated by either a case manager or a program manager upon a participant's exit from the program.

The assistant program manager stated that LAHSA provides and schedules participant matches through Calendly, with matched individuals expected to report to the site within three days of receiving a placement. Matches are canceled if the individual does not arrive within that period.

According to the lead manager, the program is intended to last 90 days; however, some participants have remained at the site for up to four years while awaiting PSH placement. Participants may decline as many as three PSH offers before being removed from the program. The lead manager noted that declined offers are sometimes attributable to concerns about location or safety.

Council District 3

- ***Interim Housing site:*** Nardello & Co. selected this site for review because reported data indicates that the site transitioned from "In Process" in FY 2025-26 Q2 to "Open/In Process" in FY 2025-26 Q3. In the third quarter, the site reported 144 units/beds and 87 PEH served.

On July 28, 2026, Nardello & Co. spoke by telephone with a property manager affiliated with service provider that manages both the property and onsite programs. He said the hotel contained 134 units, of which 91 were occupied at the time of the interview, with one move-in scheduled for the following day. All current residents were PEH. The property had been issued a temporary certificate of occupancy for 133 to 134 residents and was expected to complete construction between September and December 2026. Between 10 and 20 units were not voucher-restricted and could be rented to individuals who met applicable income requirements.

The property manager invited Nardello & Co. to contact him by email for additional inquiries. When Nardello & Co. emailed the property manager on July 31, 2026, a member of the service provider's legal department responded, requesting additional information. Nardello & Co. has yet to receive a response to its follow-up email.

Council District 4

- ***Interim Housing site:*** This site was selected for review due to the substantial increase in reported PEH served between FY 2025-26 Q2 and FY 2025-26 Q3. While the number of PEH served increased by 68, from 470 to 538, the reported capacity remained constant at 143 units/beds. The site was also among those referenced in the Court's Attorneys' Fees Order ([Dkt. 1127](#), page 8), which described a prior "significant" decline in cumulative counts during the quarter ending September 30, 2025, notwithstanding the Court's observation that "the cumulative numbers should have continued their pattern of increase..."

On July 22, 2026, Nardello & Co. spoke with an onsite case manager with the service provider associated with this property who stated that he had worked at the site for nearly four years. He reported that the property's maximum occupancy is 143 residents, with three units reserved for management and food preparation, and the remaining units configured



with two beds each. According to the representative, all residential units are designated for PEH.

According to the case manager, units turnover frequently and the time required to return a unit to service varies. At the time of the site visit, he stated that three units were in turnover. Prolonged unit unavailability is often attributable to plumbing problems, he noted, which took 19 units offline in late 2025. He could not provide the property's current occupancy count.

The case manager stated that participant information is updated daily in HMIS and that he also maintains an internal tracking spreadsheet in SharePoint that is shared with various partner organizations. According to the representative, when a unit becomes available, the property's HMIS records are updated to notify LAHSA of the vacancy.

The representative stated that the property receives email referrals from LAHSA. The objective is to complete matching and intake on the same day. While his organization used to be able to request what he described as a "reverse match" when staff identified PEH in the vicinity of the property who might benefit from housing. According to the representative, the practice has become less common due to funding constraints. The representative further stated that participant exit destinations are tracked in HMIS and transfers between shelters are documented in a Google document maintained through LAHSA. He noted, however, that certain information was not recorded during a major fire-related emergency.

The case manager stated that homeless verification forms are among the documents required before a participant may move into the property, and are both uploaded to HMIS and maintained in hard copy onsite. Participants must meet the eligibility criteria for being considered "chronically homeless," which means having experienced homelessness on at least three occasions within a four-year period or continuously for one year or longer.

The case manager defined "served" as any individual who has been connected to services through the program. He stated that an individual is counted as served even if his stay at the site is limited to only a few days.

Council District 5

- **Interim Housing site:** Nardello & Co. selected this site for review because its reported status changed from "In Process" in FY 2025-26 Q2 to "Open" in FY 2025-26 Q3, with 60 units/beds and 68 PEH served reported in FY 2025-26 Q3.

During a July 22, 2026 site visit, Nardello & Co. was informed by a building representative that approval from site management was required before access could be granted. Upon review by the site manager, the deputy chief of programs at the service provider associated with this property, and, ultimately, the organization's CEO, Nardello & Co. was granted access to the facility and conducted an interview with the site manager and deputy chief of programs, who participated remotely.

The site manager and Deputy Chief of Programs stated that the facility, which opened on January 5, 2026, contains 30 units with capacity for 60 residents and serves transitional-age youth, aged 18 to 24. The property and was fully occupied at the time of the visit.



Turnover is low, with departures occurring in fewer than 5% of cases and vacant units being filled within 24 to 72 hours, they said.

According to the site manager, the LAHSA-funded property reports exclusively through HMIS. He stated that referrals are received through CES and individuals matched to available units are given 48 hours to accept placement. The site manager noted that admission requires a tuberculosis test, homeless verification documentation, and a LAHSA referral email.

The representatives stated that resident exits and destinations are documented in HMIS. If a resident's destination is unknown at the time of exit, staff may temporarily classify the departure as an "exit destination unknown." According to the representatives, staff undertake efforts to identify the resident's destination whenever possible, including by contacting hospitals, law enforcement agencies, and designated emergency contacts.

The site manager and deputy chief of programs also described the occupancy and reporting definitions used by the program. According to the interviewees, an individual is considered "served" when actively enrolled in the program and reflected as such in HMIS. "Vacant" refers to beds available to receive referrals, "offline" refers to beds that are temporarily unavailable due to maintenance or repair needs, and "occupied" refers to beds that are both physically occupied and associated with an active program enrollment.

Council District 6

- ***Interim Housing site:*** Nardello & Co. selected this site for review because it experienced the largest reduction in reported units/beds among sites that remained open across consecutive reporting quarters. Reported data reflected a decrease from 33 units/beds in FY 2025-26 Q2 to 23 unit/beds in FY 2025-26 Q3. During the same period, the site reported 71 PEH served in both quarters.

On July 28, 2026, Nardello & Co. spoke with a motel employee, who stated that the property manager was not onsite at the time of the visit and that she was not authorized to provide the property manager's contact information.

According to the City's quarterly report filed on July 30, 2026, the site reported 46 units/beds in FY 2025-26 Q4, an increase from 23 units/beds in the prior quarter. The number of PEH served also increased during that period, from 71 to 96.

When, on August 31, 2026, Nardello & Co. attempted a second visit, a receptionist stated that the property manager was unavailable and advised the team to return at a later time. Follow-up telephone calls to the property were unsuccessful.

During a September 18, 2026 meeting, a representative from the service provider associated with this property offered to accompany Nardello & Co. on a future site visit to the property.

- ***Interim Housing site:*** This site was selected for review because it reported the largest quarter-over-quarter decline in PEH served, from 111 in FY 2025-26 Q3 to 67 in FY 2025-26 Q4. According to a footnote in Exhibit A of the City's quarterly report filed on July 30, 2026, the site was one of thirteen booking/occupancy agreement sites for which the



reported number of PEH served was adjusted downward from the figures reported in the prior quarter.

On August 31, 2026, Nardello & Co. spoke to a program manager affiliated with the service provider associated with this property, who stated that she was unable to provide occupancy information and asked that a meeting be scheduled to discuss the matter. Nardello & Co. spoke with the property's manager, who stated that the site contains 40 rooms, of which 37 were designated for City-funded housing and all 37, which each contained one or two beds, were occupied at the time of the visit. The property manager was unable to provide the total number of residents because his responsibilities are limited to managing the rooms.

According to the property manager, the hotel operates under a contract with the Mayor's office and provides occupancy updates every Monday and Thursday through a Google form that includes the number of occupied and available rooms. He stated that the Mayor's office follows up by telephone or email when clarification is needed. He added that he maintains exit records and submits invoices to the City every 15 days.

Council District 7

- ***Permanent Supportive Housing site:*** This site was selected for review due to its early opening date within the Settlement Agreement period. FY 2025-26 Q3 reported data indicates that the site became open and occupiable on October 11, 2022, and reported 55 units/beds and 51 PEH served.

During a site visit on July 28, 2026, Nardello & Co. spoke with a property manager, who said he was unavailable to discuss the property and asked that any inquiries be submitted by email.

Council District 8

- ***Permanent Supportive Housing site:*** This site was selected for review because City-reported data reflected a comparatively low number of PEH served relative to the number of unit/beds available. Specifically, FY 2025-26 Q3 data reported 80 units/beds and 54 PEH served.

During a July 24, 2026 site visit, Nardello & Co. spoke with representatives of a service provider associated with this property, who stated that they were unable to participate in an interview and provided contact information for the organization's main office. Onsite staff stated that the building, which opened in 2024, contains 75 to 80 one-bedroom units, approximately 50 of which were occupied at the time of the visit. Onsite staff would not opine on the low occupancy rate. Attempts to contact the service provider were unsuccessful.

Council District 9

- ***Permanent Supportive Housing site:*** This site was selected for review due to its early opening date within the Settlement Agreement period. FY 2025-26 Q3 reported data indicates that the site became open and occupiable on November 1, 2022, and reported 48 units/beds and 47 PEH served.



During a July 24, 2026 site visit, Nardello & Co. spoke with a representative of the onsite property manager, who stated that she was unable to meet at the time of the visit and requested that the team return at a later date.

Council District 10

- ***Permanent Supportive Housing site:*** This site was selected for review due to its early opening date within the Settlement Agreement period. FY 2025-26 Q3 reported data indicates that the site became open and occupiable on October 17, 2022, and reported 53 units/beds available and 50 PEH served.

During a July 24, 2026 site visit, the onsite property manager stated that the property, which opened in January 2023, contains 53 units designated for PEH; 11 units reserved for DMH referrals; and some “general availability” units, of which three were vacant at the time of the visit.

According to the site manager, unit turnover typically takes approximately two months because units often require remediation before they can be reoccupied. She stated that referrals/matches are received through CES and prospective tenants must complete a universal housing application, provide income and asset documentation, and undergo a criminal background check. The property has one week to accept a matched applicant, while applicants generally have one to two weeks to move in, although extensions are commonly granted.

The site manager said move-in information is tracked in an internal Excel spreadsheet, and tenant files are maintained onsite. She communicates with LAHSA and HACLA primarily through email. She further stated that resident exits are reported to HACLA through move-out notices and tracked internally by the property management company.

Two case managers affiliated with the onsite service provider said their duties include case management, documentation, and HACLA recertification. According to the case managers, CHAMP is used for tracking participants' transition to PSH, while HMIS is used primarily for Interim Housing programs. They further stated that tenant departures are documented in CHAMP and reported to HACLA. TPC maintains an internal tracker containing exit information for all sites where it operates, the managers said.

- ***Permanent Supportive Housing site:*** This site was selected for review because its reported status changed from “In Process” to “Open” in FY 2025-26 Q4. According to reported FY 2025-26 Q4 data, the site had an open and occupiable date of April 9, 2026, and reported 42 units/beds and 40 PEH.

During a September 3, 2026 site visit, Nardello & Co. spoke with a resident manager employed by the property manager. According to the resident manager, the mixed-used property contains 42 PSH units, with one vacancy at the time of the visit. She said the property manager was unavailable and asked that any follow-up discussion be scheduled for a later date.

Council District 11

- ***Permanent Supportive Housing site:*** Nardello & Co. selected this site for review due to its transition from “In Process” to “Open” status between FY 2025-26 Q2 and FY 2025-26



Q3. Exhibit A reports that the site had 40 units/beds and 31 PEH served in FY 2025-26 Q3.

During a July 22, 2026 site visit, Nardello & Co. spoke to two individuals who identified themselves as representatives from the property's case management services provider. They said the property houses multiple programs, but declined to provide additional information and referred Nardello & Co. to the property manager for further information.

- ***Permanent Supportive Housing site:*** This site was selected for review because it was identified in the Court's Attorneys' Fees Order ([Dkt. 1127 at 8](#)) as one of several "permanent supportive housing types...reported as going from full occupancy, to a pending occupancy number, and then to less than full occupancy." Reported data reflected 59 units/beds and 56 PEH served in FY 2025-26 Q2, compared to 59 unit/beds and 54 PEH served in FY 2025-26 Q3.

During a July 22, 2026 site visit, the property manager stated that the property contained 59 residential units, one manager's unit, and five vacant units. She said that referrals are managed through a platform called Concourse and that ten referrals had been received for the five vacancies.

Safety concerns have affected operations at the property, she said, citing recurring problems in neighboring buildings, including drug activity and prostitution. Case manager turnover is high, she noted, but could not provide information regarding tenant turnover. Rent obligations are income-based, with most tenants paying no rent. The property manager also stated that evictions are infrequent, typically require substantial justification, and can take a significant amount of time to complete.

The property manager stated that the property has reporting obligations to more than 100 entities, including DMH and NPLH. During the visit, Nardello & Co. observed significant construction activity at adjacent buildings with private security and law enforcement personnel onsite.

Council District 12

- ***Interim Housing site:*** This site was selected for review because it was moved from "In Process" in FY 2025-26 Q2 to "Open/In Process" in FY 2025-26 Q3, with 115 available units/beds and 79 PEH served.

On July 28, 2026, Nardello & Co. spoke with a site manager who stated that she was unavailable to discuss the property at that time and requested Nardello & Co. contact her by telephone at a later date.

Council District 13

- ***Interim Housing site:*** Nardello & Co. selected this site for review because reported data indicated a notable increase in PEH served between FY 2025-26 Q2 and FY 2025-26 Q3. Although the site reported 52 units/beds in both quarters, the number of PEH served increased by 64, from 110 to 174, while reported capacity remained constant.



During a July 22, 2026 site visit, Nardello & Co. spoke with a representative of the onsite service provider who stated that the facility is an all-male interim housing site with 52 beds designated for PEH. According to the representative, LAHSA coordinates referrals and matches individuals to available beds, with referrals generally originating from outreach teams working in local encampments and intake requiring government-issued identification and a Social Security card. The representative said he could not provide information regarding referral-to-move-in timelines or waiting lists.

According to the onsite service provider representative, occupancy and vacancy data are tracked through HMIS and vacancies are typically filled within two days, he noted. Turnover most often results from transitions to permanent housing or discharges related to program-rule violations. At the time of the visit, 50 beds were occupied and two beds were offline due to damage. Long-term vacancies are rare, he said, and generally associated with units requiring significant repairs.

The representative stated that an “occupied” bed is one that has been assigned to a resident through the intake process, whereas a “vacant/available” bed is one that is open for placement. The facility does not use the term “served” in its operational or reporting practices, he explained.

According to the representative, the facility maintains onsite security and requires residents to sign a nightly roster. He stated that HMIS records are updated as resident status changes occur and case managers conduct and document participant meetings approximately twice each month. The representative further stated that the facility tracks exits, destination outcomes, early departures, and program abandonments. Hard-copy case files are maintained onsite and retained for ten years.

A headquarters-based representative of the service provider declined Nardello & Co.’s request for additional access to the facility. He stated, however, that he would be available to respond to follow-up questions and provided his telephone number.

- ***Permanent Supportive Housing site:*** Nardello & Co. selected this site for review due to its transition from “In Process” to “Open” status between FY 2025-26 Q2 and FY 2025-26 Q3. Exhibit A reports that the site became open and occupiable on January 26, 2026, and reported 52 units/beds and 15 PEH served during FY 2025-26 Q3. The reported open date indicates that the site was operational for more than two months during the quarter.

During a July 23, 2026 interview, an onsite property manager stated that the property contains 103 residential units and one manager’s unit. Approximately 50 to 52 units are one-bedroom units, including at least one unit occupied by multiple individuals. The rest are affordable housing units offered at below-market rents. According to the property manager, approximately 40 units were vacant at the time of the interview.

- ***Permanent Supportive Housing site:*** Nardello & Co. selected this site for review because reported sources reflected differing unit counts for the property. Exhibit A reported 41 units/beds and 36 PEH served as of FY 2025-26 Q3 and listed the site as “Open” in both FY 2025-26 Q2 and FY 2025-26 Q3. By contrast, a January 28, 2026 Project Homekey status document identified 69 units at the property, including two manager’s units.



On July 27, 2026, Nardello & Co. team members spoke with a representative affiliated with the onsite property manager who said she was in a meeting and asked us to call her to set up a time to speak.

- ***Interim Housing site:*** Nardello & Co. selected this site as, according to Exhibit A, it experienced the second-largest reduction in reported units/beds among sites that remained open between FY 2025-26 Q2 and FY 2025-26 Q3. The site's reported units/beds decreased from 54 to 46 during that period, while the PEH served reported increased by one, from 69 to 70.

During a visit on July 27, 2026, Nardello & Co. spoke with a program manager who explained that she needed to call her organization's associate director before discussing the site. Nardello & Co. was told that, because the property is a closed site, further inquiries should be directed to her organization's headquarters.

- ***Permanent Supportive Housing site:*** Nardello & Co. selected this site for review due to its transition from "In Process" in FY 2025-26 Q2 to "Open" in FY 2025-26 Q3, with 71 units/beds and three PEH served. According to Exhibit A, the site's open and occupiable date was March 30, 2026, one day before the close of the reporting quarter.

During a July 27, 2026 site visit, Nardello & Co. spoke with a property manager who stated that she was unavailable due to a meeting. She took a business card from Nardello & Co. and said she would consult with the property owner and her supervisor regarding any information that could be shared.

Council District 14

- ***Interim Housing site:*** This site was selected for review because reported data reflected a substantial increase in PEH served between quarters, from 58 in FY 2025-26 Q3 to 93 in FY 2025-26 Q4.

During a September 1, 2026 site visit, Nardello & Co. spoke with an onsite program manager who stated that the site serves PEH, including single adults, couples, and families. He reported that the property contains 27 units, has operated for at least three years, and had at least five vacant units at the time of the visit. Staff conducts wellness checks five times daily, submits scanned documentation to supervisors at the end of each shift, and maintains case management records electronically, he said.

Nardello & Co. also spoke with a supervisor affiliated with the onsite service provider, who stated that participant information, occupancy data, and exit information are maintained in HMIS and reviewed through biweekly invoice processes. According to the supervisor, outreach teams enroll participants into the Inside Safe program, while the case manager is responsible for bed assignments. He further stated that case managers are expected to enter participant information within 24 hours, although data entry may be delayed until the following day during high intake periods. The supervisor stated that case managers rely on HMIS, specifically the HMIS inventory module, which was recently modified to allow multiple occupants to be recorded within a single room. Prior to that change, couples and families were recorded as occupying a single bed per household.



The supervisor said he submits occupancy information to the Mayor's office through a Google form. Twice each month, his organization's accounting team reviews occupancy and inventory information, coordinates with property managers as needed, and submits invoices to the Mayor's office. Representatives of the Mayor's office follow up when clarification is required.

When asked about the availability of a data snapshot as of June 30, 2026, the supervisor stated that either the City or his organization's accounting team would have access to the information. He referred Nardello & Co. to an accounting program director for any follow-up inquiries.

The supervisor said the organization maintains an internal Excel spreadsheet on a shared drive, which is shared with property owners and the City.

Nardello & Co. spoke with the property manager, who stated that he does not report information directly to the City and that his responsibilities are limited to property management and maintenance functions.

- ***Permanent Supportive Housing site:*** Nardello & Co. selected this site for review because Exhibit A data indicated a relatively low number of PEH served compared to the number of available units/beds. FY 2025-26 Q4 data reflected 98 units/beds and 63 PEH served.

During a September 1, 2026 site visit, Nardello & Co. spoke with an onsite program manager who stated that the property contains 99 PSH units and one manager's unit, all configured as single-occupancy units. The representative stated that occupancy information and pending matches are reported verbally during weekly supervisory meetings. He further stated that occupancy information had been reported through a now-inactive HACLA website. He was unaware of any replacement system. The representative stated that he was not familiar with HMIS.

According to the representative, vacancies are reviewed weekly, and daily walkthroughs are conducted to monitor site conditions. He estimated that approximately 35 units were vacant at the time of the interview. The representative further stated that the matching process typically takes three to four months from enrollment to move-in, but noted that the property was not accepting new matches at the time of the visit. The representative said he did not know why the property was not accepting new matches.

- ***Permanent Supportive Housing site:*** This site was selected for review because Exhibit A reported data indicated a relatively low number of PEH served compared to the site's reported capacity. According to Exhibit A, FY 2025-26 Q4 data reflected 224 units/beds and 145 PEH served.

On September 1, 2026, Nardello & Co. spoke with a site manager who stated that the building was constructed in 2024 but did not begin accepting residents until 2025. According to the site manager, the property has experienced numerous "large-scale intrusion events" during her tenure.

According to the site manager, the property contains 225 units designated for PEH, of which 83 were vacant at the time of the interview, the highest vacancy level the manager had seen. The site manager further stated that move-ins had been paused because



remediation work was underway following what she described as multiple “large-scale intrusion events,” the most recent of which involved a resident’s guest who attempted to steal copper wire from the water system, affected more than 20 units and several common areas.

LAHSA remains on the site’s master lease, although future agreements will be managed through the Los Angeles County Department of Homeless Services and Housing, according to the site manager. She stated that the property uses AppFolio to track vacancies and unit readiness, but, as ICMS does not have access to the platform, coordination occurs via email and weekly meetings. Vacancy information had not been updated in the system in several weeks, she noted. Shared Excel spreadsheets that are used to track vacancies, maintenance projects, and other operational matters, contain high-level information rather than unit-level data.

The site manager did not know how the City receives data from the property. She reported that information that was reported to LAHSA, which would follow up when questions arose regarding reported information, is now provided to the Department of Homeless Services and Housing. Vacancy information had been reviewed during weekly LAHSA meetings via a shared spreadsheet, but the process has been replaced by verbal reporting during Ops Agenda calls.

LAHSA had communicated matches through biweekly meetings and email communications. She said she did not know if she had access to the HMIS database.

- ***Permanent Supportive Housing site:*** This site was selected for review because according to Exhibit A, it had experienced the second-largest decline in reported PEH served between FY 2025-26 Q2 to 102 in FY 2025-26 Q3, decreasing from 110 to 102 PEH served while units/beds remained unchanged at 146.

On July 23, 2026, Nardello & Co. spoke with a regional property manager who oversaw this property along with several others in Los Angeles County. The property manager stated that the site operates under a master lease, with County oversight of the master lease portfolio replacing LAHSA oversight as of June 30, 2026. She reported that the property contains 169 single-occupancy studio units. The property manager was overseeing multiple resident relocations at the time of the visit, including relocations associated with the closure of 14 master lease properties and the transfer of 51 individuals from another site. Nardello & Co. later learned that the transfer from the other site was related to flooding.

The property manager attributed the reported decline in PEH served to several factors, including water damage, elevator outages, and incidents involving the theft of copper wiring – conditions that occasionally required residents to be temporarily relocated while repairs were completed. The property manager further stated that some residents chose to use their vouchers at other properties at the conclusion of LAHSA’s time-limited subsidy program in August 2025, while certain undocumented residents had been transferred from master lease sites to other locations.

Nardello & Co. observed three individuals affiliated with an onsite service provider setting up workstations in the building lobby. The property manager stated that both property management staff and service provider personnel enter data into their respective systems, with property management using AppFolio and service provider staff using HMIS and

CHAMP. When asked whether information is entered in real time or recorded manually before being entered, the property manager stated that the team does not maintain handwritten notes and relies on electronic systems for data entry. She noted that the property has begun maintaining hard-copy records for income verification purposes.

Council District 15

- **Permanent Supportive Housing sites:** Nardello & Co. visited two sites under construction that collectively accounted for 88 units/beds. According to FY 2025-26 Q2 reporting, both sites were removed from Exhibit A because it was no longer anticipated they would be completed in time to satisfy the requirements of the Settlement Agreement.

On July 24, 2026, Nardello & Co. spoke with employees of the property developers at both sites.

- A site superintendent at the first site said the construction that began in April 2026 was expected to continue for approximately 20 months, with completion projected for December 2027. Inspection, permitting, regulatory, or construction-related delays may occur. The project will include 49 residential units and one manager's unit, with two beds in each residential unit.
A project manager at the second site said the construction that began on January 21, 2026, is projected to be completed on August 23, 2027. However, project timelines are commonly extended by several weeks for a variety of reasons. The development will include 40 two-bedroom family units. The project owner will determine the number of beds per unit.

8. OPEN SOURCE RESEARCH

In addition to site visits and meetings with stakeholders, Nardello & Co. conducted open-source research to supplement information obtained through interviews and onsite observations.

- Nardello & Co. undertook open-source research to identify the service providers operating at each site, reviewing publicly available information and media coverage concerning the sites, and gathering contextual information to help guide onsite interviews and follow-up inquiries.

For example, before visiting one Interim Housing site in CD 4, Nardello & Co. identified a City of Los Angeles report dated May 2024 that stated: "The site is operated by People Assisting the Homeless (PATH), and they also currently hold the lease agreement with the owner of the hotel. PATH has requested to transition the lease to the City due to the inability to pay the lease on time based on the current reimbursement payment structure and limited advances from LAHSA. In addition, PATH reports that holding the lease creates a tax liability." During Nardello & Co.'s visit, PATH personnel stated that PATH has operated at the site since it opened.

- For sites that Nardello & Co. was unable to visit during the reporting period, the team conducted open-source research to corroborate the existence and operational status of the reported locations. This research included reviewing media reports, official documents, publicly available records, and Google Street View imagery.

- Nardello & Co. conducted open-source research concerning the Interim Housing service providers identified in a list provided by LAHSA. The purpose of this research was to obtain background information regarding the organizations' roles and responsibilities and to provide context for observations and interviews conducted during site visits.

Nardello & Co. expects to continue this research throughout the duration of its engagement as the Independent Data Monitor, to supplement information obtained through site visits, stakeholder interviews, and other review activities.

9. FINDINGS AND ANALYSIS

9.1 Data Limitations

Throughout the review, Nardello & Co. did not receive direct access to the databases maintained by the relevant agencies or to the underlying raw data. Agency representatives described the systems and methods used to collect, store, and report information, and Nardello & Co. reviewed the records and reports made available during the review. Accordingly, the observations in this section are based on the information reviewed and the processes represented to Nardello & Co. In not having direct access to the underlying databases or source data, Nardello & Co. was unable to independently validate the completeness, accuracy, or reliability of the underlying data or database contents.

Nardello & Co. met with LAHSA representatives on multiple occasions, both in person and remotely, to discuss how LAHSA collects, maintains, and reports data relating to Interim Housing and Master Leases to the City as required by the 2022 Settlement Agreement. The discussions focused on, among other things, the HMIS database, which LAHSA described as the primary system used to track participant-level data for homelessness services programs in Los Angeles County.

According to LAHSA, contracted housing and service providers are responsible for maintaining and entering inventory and occupancy information in HMIS. Thus, service providers are the source of HMIS data. LAHSA does not check the accuracy of the data entered by service providers, and stated that reporting accuracy depends on proper site configuration and the providers' data entry practices. Additionally, reporting for master leased sites is more challenging because bed-level information is not consistently maintained, therefore, reconciling occupancy and inventory data for those sites is difficult. Given these limitations, the source data for HMIS, from which LAHSA extracts information to provide to the CAO's office cannot be verified.

LAHSA stated that the matching and referral process can help identify inaccurate bed inventory data in HMIS. If HMIS reflects more available beds than a site can accept, the matching team may refer an individual to a bed that is not, in fact, available. According to LAHSA, the provider or appropriate LAHSA personnel would then address the discrepancy and update the site's reported bed count in HMIS.

During a meeting on July 7, 2026, LAHSA demonstrated selected HMIS functions to Nardello & Co. using mock training data. The demonstration provided information about the system's functionality, but did not permit Nardello & Co. to assess the completeness or accuracy of participant information maintained in the active database. Nardello & Co. did not receive access to, or an extract from, the HMIS database for review.



LAHSA stated that its active system management teams perform data quality control oversight, including recurring site visits. Nardello & Co. has not met with members of these teams and therefore has not been able to assess the nature, frequency, or effectiveness of their oversight procedures. In any event, LAHSA's quality control oversight appears to apply only to data after it has been entered into HMIS, which would not ensure the accuracy of the data entered by service providers at the outset.

Nardello & Co. met with LAHD personnel on multiple occasions to discuss the agency's reporting processes and responsibilities as related to projects included in the City's quarterly report. LAHD identified HMIS as its primary project-management system and stated that HMIS contains information concerning the development and completion of new housing projects. LAHD further stated that HMIS data is not used to produce the occupancy figures included in quarterly reporting. However, LAHD systems analysts explained that certain project-level information from HMIS – including project names, addresses, funding sources, development status, completion status, ready-for-occupancy dates, and HMIS identification numbers – is used to identify projects and prepare survey requests sent to property managers. Accordingly, HMIS appears to support portions of the quarterly data-collection process.

LAHD is also responsible for reporting information concerning certain Homekey projects. LAHD personnel stated that their responsibilities included reporting on Homekey sites undergoing rehabilitation. In Exhibit A, these sites are identified by a project type containing "Homekey" and a status of "Open/In Progress." According to LAHD, two Homekey sites were undergoing rehabilitation during the second quarter of 2026.

According to LAHD personnel, data relating to approximately 90 to 100 LAHD projects is collected from the property managers via a Google form. LAHD emails the form to property managers, who enter the information for their respective sites that is used to populate a live worksheet. LAHD staff reviews the collected data and resolves any identified issues by further communications with the property managers. Like LAHSA, LAHD has no means of independently capturing and verifying the project occupancy and status information reported by the property managers. After some editing, the worksheet data is manually transferred to another spreadsheet, which is sent to the CAO's office.

Nardello & Co. requested the production of all documents and materials used for the compilation and submission of LAHD project data to the CAO for the quarterly report filed by the City on July 30, including the Google form; the list of recipients of the form; and all responses and related correspondence (*e.g.*, emails, messages, notes). In response, Nardello & Co. received a limited set of documents in PDF format, including a sample of the Google form; a "working copy" spreadsheet reflecting form responses that contained unexplained annotations, and a sample initial and reminder emails sent to property managers. Nardello & Co. was informed that "LAHD does not currently have a manageable way of pulling correspondence with the property managers related to this request for information. LAHD is in the process of developing a separate email address that it can use for those communications." The small set of sample documents was insufficient for Nardello & Co. to assess LAHD's process for obtaining site and occupancy-related data for the projects included in the City's quarterly report.

LAHD personnel described a separate process for gathering information on certain Homekey projects, one in which staff meets with developers and receives verbal updates on occupancy, which are then entered into a Master Report, a live workbook that is updated on a regular basis by many



staff throughout the City. As such, there are no historic versions available for Nardello & Co.'s review.

LAHD technical staff stated that the agency was working to automate portions of this process to reduce manual data entry and improve preservation of the submitted information. As of the filing of this report, Nardello & Co. could not assess the proposed automation or its anticipated effect on data quality.

Finally, Nardello & Co. met on two occasions with HACLA representatives to discuss its reporting processes and responsibilities as related to projects included in the City's quarterly reports. HACLA identified Yardi as its primary system of record and stated that Yardi contained detailed participant information including lease data, rental subsidiary records, and personally identifiable information used to determine eligibility. Yardi reports also contain program-level information, including unit allocations and unit counts, and can be filtered by building. HACLA stated that access to the system is restricted through user permissions and that, while approximately 700 employees have some level of access, permissions vary based on job responsibilities. With respect to reporting to external stakeholders, including the CAO's office, HACLA generally provides aggregate or summation data, rather than underlying raw data, citing privacy concerns.

HACLA explained that information provided to the City may originate from multiple departments within the organization, including the assisted housing services department, the asset management department, and the asset development department. The assisted housing services department compiles information from Yardi utilization reports, while Homekey information is generally supplied by asset management department. HACLA representatives did not know how the asset management department collects information, although they believe that both the asset management department and the asset development department receive information from the property management firms that oversee the buildings. HACLA also did not know if information from different departments is submitted to the CAO's office via separate reporting templates or via a single, consolidated template.

While HACLA stated that corrections and amendments made in Yardi are documented, representatives did not know if the agency could generate a comprehensive audit history report showing all changes. HACLA further stated that while it can generally identify when an application was assigned and the target lease-up date, it does not maintain information tracking the full lifecycle of an application from receipt through move-in.

9.2 Data Reconciliation

Nardello & Co. anticipated receiving the underlying raw data relied upon by the City in preparing the quarterly report for FY 2025-26 Q4, including data maintained in HMIS, which LAHSA described as a principal source of information used in the reporting process. LAHSA stated that it did not provide access to the underlying HMIS data because those data contained personally identifiable information.

In lieu of the underlying data, Nardello & Co. received a data set including, among other things, the reporting templates that LAHSA, LAHD, and HACLA had completed and submitted to the CAO's office for FY 2025-26 Q4 and related correspondences. LAHSA, in particular, provided the templates in a Microsoft Excel workbook containing separate worksheets that corresponded to exhibits filed by the City. The workbook reflected the information transmitted to the CAO for inclusion in the City's report but did not include the underlying records from which the reported



figures were derived. Based on Nardello & Co.'s review, much of the information from the completed reporting templates was copied directly into the exhibits attached to the City's report.

Nardello & Co. attempted to reconcile the figures contained in the completed reporting templates with figures reported by the City in the FY 2025-26 Q4 quarterly report. The reconciliation involved the following documents included in the data set: *Alliance FY25-26 Q4 Intervention Data Report LAHSA - FINAL V7 - 2026 7 29.xlsx*; *DRAFT LAHD PSH Homekey - Open Occupiable as of June 30, 2026.xlsx*; *PHK 1 Data Request FY 25-26 Q4.xlsx*; *PHK 2 and PHK 3 Data Request FY 25-26 Q4.xlsx*; *Jordan Downs Phase S4 Data Request FY 25-26 Q4.xlsx*.

With respect to six instances in which the data did not align, Nardello & Co. was able to identify explanations by the reporting agencies or ongoing investigative steps for the mismatches.

Seven sites referenced in the City's report but not in the data set are still in process and have not yet opened. Two sites included in the data set but not in Exhibit A are associated with programs that had been demobilized prior to the reporting date.

Bed counts from nine sites in LAHSA's reporting template did not reconcile with the figures reported in Exhibit A. LAHSA explained to Nardello & Co. that it receives the outline of this Excel file from the CAO's office with the bed totals populated. The CAO's office populates this column in accordance with the provider contracts. For each value in LAHSA's reporting template that did not reconcile with Exhibit A, LAHSA included notes that either explain the discrepancy or indicate that an investigation is ongoing.

There are 43 sites with a figure missing from either the reporting templates or Exhibit A. The missing figures generally reflect either open sites for which vacancies were not reported in the applicable data files or sites still in process for which PEH was not reported. The two sites where vacancies differ were attributed to timing differences associated with the short reporting window. Across the two sites, the vacancy figures differed by a combined total of three beds.

Finally, there were six sites where the reported statuses did not reconcile. Two sites listed as open in the data set were listed in the City's report as having closed in mid-June. The remaining four sites were in process or "Open/In Process" in the report but listed as open in the data set.

While the discrepancies between the figures contained in the agencies' reporting templates and the figures reported by the City are relatively small in the context of the data reported for 279 sites, this is to be expected as it appears that the CAO's office largely copied the numbers from the reporting templates. As stated above, given that the reporting templates are compiled from self-reported information from property managers and service providers, this information cannot be independently verified.

The absence of the underlying records materially limited Nardello & Co.'s ability to assess the accuracy of self-reported historical data. Access to those records would have permitted additional analyses designed to identify anomalies, inconsistencies, or unusual patterns within and across reporting periods. Because the underlying data were not provided, Nardello & Co. was not able to perform these analyses, and its review should not be understood as an independent validation of the completeness or accuracy of the historical data.

9.3 Discrepancies Identified

Who Reports Information

Nardello & Co. identified differing descriptions of the reporting channels used by service providers and property managers.

- During meetings with the CAO's office on May 19, 2026, and LAHSA on June 1, 2026, representatives stated that service providers enter information into HMIS.
- During an August 31, 2026 site visit to an Interim Housing site in CD 6, however, a property manager stated that he reports occupancy information to the Mayor's office through a Google form twice weekly. The property manager subsequently stated that his responsibilities are limited to property services and maintenance and that he does not report any information to the City.
- During a September 1, 2026 site visit to another Interim Housing site in CD 14, a service provider representative stated that he reports occupancy information to the Mayor's office through a Google form, and that the property manager does not report information to the City.

These statements reflect differences in site-level responsibilities or parallel reporting processes; the information reviewed did not establish whether the described reporting channels were inconsistent or served different purposes.

In addition, Nardello & Co. learned that different teams from HACLA provide information to the CAO's office. In the July 2, 2026 meeting, HACLA's attorney explained that data reported to the CAO's office originates from multiple departments and systems. HACLA's representative added that he did not know whether each department submits information through separate templates or whether a single master reporting template exists. It is unclear how these departments communicate with each other regarding reporting responsibilities, if at all.

LAHD Homekey Reporting

Initial interviews did not establish which LAHD department was responsible for reporting occupancy data for Project Homekey sites. During an August 13, 2026 meeting, a representative ("Representative A") of LAHD's occupancy monitoring team stated that she was not responsible for Project Homekey counts and identified two other representatives as responsible for that reporting. During an August 27, 2026 meeting, one of those two representatives ("Representative B") stated that her responsibility was limited to Homekey sites undergoing rehabilitation and that, upon completion of rehabilitation, responsibility for monitoring occupancy transferred to the occupancy monitoring team.

On September 3, 2026, Nardello & Co. requested clarification from LAHD regarding who is responsible for unit and occupancy counts for each project listed in the spreadsheet provided to the CAO's office.

On September 14, 2026, LAHD responded:

The Housing Strategies Homekey Unit, overseen by [Representative B], only tracks the unit and occupancy counts for the 19325 Londelius and 20205 Ventura projects, which are currently undergoing rehabilitation while remaining partially



occupied. The unit and occupancy counts for the remaining sites are provided by the Occupancy Monitoring Unit, which is overseen by [Representative A].

Inside Safe Data Reporting

Based on information provided to Nardello & Co. by stakeholders, information relating to Inside Safe participant, occupancy, and capacity appears to be maintained and reported through multiple systems and reporting channels rather than through a centralized process.

According to LAHSA, participant-level information is reported primarily through HMIS, but LAHSA generally does not enter the underlying data. Instead, service providers operating Inside Safe sites are responsible for recording enrollments, exits, bed assignments, and other related information.

Accordingly, the completeness, timeliness, consistency and accuracy of participant-level reporting largely depend on data-entry practices by numerous service providers rather than a single, standardized process. Nardello & Co. did not independently assess the data-entry practices of all providers or determine the extent to which differences among those practices affected the reported figures.

Offers of Shelter and Housing

During a May 19, 2026 meeting, representatives of the CAO's office described a new reporting component concerning offers of shelter and housing made during Inside Safe operations. They stated that the CAO's office intended to work with the Mayor's office to obtain information based on lists of individuals expected to be housed from each operation, and that the reporting reformat remained under development. During a September 23, 2026 meeting, a Mayor's office representative stated that, to her knowledge, the Inside Safe team did not provide information directly to the CAO's office for quarterly reporting. She also stated that neither she nor her team had access to HMIS.

The CAO's office also referenced a "by-name list." Paragraph 11(i) of the 2026 Agreement, titled "Inside Safe Offers," describes by-name lists as "operational planning documents prepared 2-4 days before each Inside Safe operation." During a September 23, 2026 meeting, however, a Mayor's office representative stated that, although many outreach teams or service providers create by-name lists, her own process did not use one. She described her process as "tent to person," meaning that it focused on individuals present at an encampment during an operation.

In relation to this information, Nardello & Co.'s review identified differences between the understanding of the Mayor's Office of the information used for quarterly reporting and the reporting process described by the CAO's office. While the representative of the Mayor's Office stated that her team does not provide occupancy or programmatic data for quarterly reporting and was unaware of any subsequent data-related inquiries, the CAO's office later confirmed that all 41 Inside Safe sites are included in quarterly reporting using HMIS data submitted by service providers.

Process of Reconfiguring Inside Safe Data

During a June 2, 2026 meeting, LAHSA stated that Inside Safe sites had been, or were being, configured at the individual-bed level in HMIS. According to LAHSA, this process required each



physical site to be created or reconfigured in HMIS so that individual beds were labeled and tied to the relevant program inventory. During a meeting on September 10, 2026, Nardello & Co. asked LAHSA about the quality-assurance procedures used to review retrospective changes made to the data through this process. LAHSA stated it was working with service providers who assigned participants to beds for historical periods dating to 2024 because providers had maintained enrollment information outside HMIS.

Nardello & Co. subsequently received a copy of an email exchange between LAHSA and a service provider concerning the Inventory Module data-cleanup process. In the exchange, the service provider stated that its data team had identified “several concerns regarding the Inventory Module data cleanup,” as follows:

One issue is that many of the beds our LAHSA rep instructed us to make available for assignment can only be brought back online as of April 3, 2026. However, many clients were enrolled pri[or]...means some clients may have periods where no available beds can be assigned.

Another concern is that one of the reports identifies 144 exited clients who also require bed assignments. Given the previous guidance to assign clients to random units, there is no clear meth[od for] completing backdated bed and unit assignments for clients who have already exited the program.

Can we please schedule a follow up meeting to clarify expectations regarding backdated assignments prior to April 3, 2026, as well as the process for assigning beds and units to the 144 clien[ts in] the program. This meeting would help ensure we have a clear understanding of the required corrective actions and establish a consistent approach moving forward.

LAHD Occupancy Data Collection

Nardello & Co. received differing descriptions of the process LAHD used to collect occupancy information. During meetings on August 13, 2026, and August 20, 2026, LAHD representatives stated that occupancy information was collected through a Google form sent to property or site managers. However, during a September 3, 2026 site visit to a PSH property in CD 1, a site supervisor stated that she submitted quarterly reporting information through an LAHD website portal and had not received the Google form. She displayed a login screen for this portal bearing the heading “LAHD Code Enforcement Division.”

Via counsel, Nardello & Co. requested from LAHD an explanation of its data collection methods. On September 14, 2026, LAHD responded:

There is no additional portal used to collect data to include in what is provided to the CAO. To the extent a property manager referred to a “portal,” he or she was likely referring to the Google form we have discussed. A separate unit of LAHD maintains the Accessible Housing Program portal, which is used to ensure that people with disabilities have an equal opportunity to rent, use, and enjoy affordable housing that has received financial or other assistance from the City of Los Angeles or LAHD; but data from the Accessible Housing Program portal is not used to compile what is provided to the CAO for purposes of Alliance reporting.

Missing Data

During an August 13, 2026 meeting, a representative of LAHD's occupancy monitoring team stated that the Google forms sent to project contacts to collect occupancy information included the relevant HIMS identification number to facilitate project-level tracking. According to the representative, project contacts did not always include or correctly enter that number on the form, which could limit LAHD's ability to associate a response with the appropriate project. She further stated that required fields had changed between reporting periods and that, on at least one occasion, a field was inadvertently designated as optional because of a miscommunication with LAHD's information technology personnel. Although LAHD subsequently corrected the field designation, the representative stated that some submissions received before the correction did not include the requested information. Nardello & Co. could not independently determine the number of submissions affected or the extent to which these issues affected the quarterly report.

LAHSA Encampment Data

During a September 4, 2026 meeting, a representative of LAHSA's data analytics team stated that after July 1, 2026, LAHSA no longer maintained the encampment tracking information reflected in Exhibit E. Whereas LAHSA staff had coordinated with outreach teams to maintain this information, the County – to which responsibility had transferred on July 1, 2026 – has not agreed to maintain or track such information. For that reason, that the data in Exhibit E should not be regarded as accurate or up-to-date. Nardello & Co. could not independently verify the County's data-maintenance practices.

Database Harmonization

Based on information obtained from agencies, site managers and service providers, relevant information is maintained across multiple databases and reporting platforms. Nardello & Co. did not identify a centralized process for integrating these systems or establish the extent to which information is exchanged or reconciled among them. Accordingly, the observations below describe the systems identified during the review but do not establish whether integration occurs outside the processes reviewed.

- During a June 1, 2026 meeting, LAHSA representatives described HMIS as the primary system used to track participant-level data across homelessness-services programs in Los Angeles County. According to LAHSA, HMIS supports approximately 8,000 users across roughly 350 agencies and contains approximately one million individual profiles.
- During a July 2, 2026 meeting, a HACLA representative stated that HACLA uses the Yardi platform to maintain records concerning program applicants and participants and that the information HACLA provides to the City and the CAO's office is generated from that system.
- During a July 7, 2026 meeting, LAHSA's head of the data analytics team stated that master-leasing information is maintained largely outside HMIS and identified AppFolio as the principal system of record for the sites discussed. She noted that bed-level information was

not consistently maintained for Master-Lease sites and that reconciling occupancy and inventory information was difficult.²

- During an August 28, 2026 meeting, PATH representatives stated that the system used to track a placement may depend on its funding source. According to PATH, County-funded placements are tracked in CHAMP, while other placements may be tracked in HMIS.

Individual service providers may cross-reference information maintained in different databases as part of their own data-entry or review practices. For example, during an August 4, 2026 meeting, an SRO Housing representative stated that the organization regularly compares information across Yardi, HMIS, and CHAMP for accuracy. During a July 23, 2026 site visit to a PSH site in CD 1, an SRO case manager similarly stated that staff record information in both HMIS and CHAMP. These provider-level practices do not establish that the systems are integrated or reconciled at the agency or organizational level.

Usage of HMIS

During a May 19, 2026 meeting, representatives of the CAO's office stated that service providers enter information into HMIS and that LAHSA uses that information to generate reports for the CAO's office. During site visits, however, site managers and service-provider representatives described differing practices concerning the systems used for particular programs and reporting functions. To date, Nardello & Co. has not been able to identify a centralized process through which information from these data sources is integrated or established the extent to which the databases exchange information at the organizational level.

- During a July 24, 2026 site visit to a PSH site in CD 10, two case managers stated that they used CHAMP rather than HMIS. According to the case managers, they understood HMIS to be primarily used for Interim Housing and CHAMP to be used for transitions to PSH.
- During a July 28, 2026 site visit to a PSH site in CD 2, a case manager stated that exit information was entered into CHAMP. He added that information from HMIS was being manually transferred to CHAMP but was not aware of a required completion date for that process.
- During an August 31, 2026 site visit to an Interim Housing site in CD 2, a program manager stated that information was updated in the Clarity database and that LAHSA had access to that system. According to the program manager, Clarity "pulls information from HMIS."
- During a September 1, 2026 site visit to a PSH site in CD 14, a service provider representative stated that he reported occupancy information orally during weekly meetings with unspecified supervisory personnel. When asked whether he used HMIS, the representative stated that he was not familiar with the database.

Referrals

As LAHSA representatives stated during a meeting on September 4, 2026, for Interim Housing referrals, an email notification is sent to the participant's care team, and the team will be instructed to schedule an intake appointment, while PSH referrals require the participant to complete a

² Based on a review of Q2 2026 Exhibit A, Nardello & Co. identified 12 Master Lease sites, among them: (i) 1200 Leighton Avenue; (ii) 1203 Rolland Curtis Place; (iii) 4222 Dalton Avenue; (iv) 639 E 21st; (v) 1261-1269 Rolland Curtis Place; (vi) 1603 West 36th Street; (vii) 1343 West 40th Place; (viii) 1317 South Grand Avenue; (ix) 6501 South Broadway; (x) 1411 South Flower Street; (xi), 920 South Gramercy Place.

Universal Housing Application. However, statements from property managers and program representatives show that referral information was communicated to sites through several channels, including email, Calendly, recurring calls, and other platforms.

- During a July 22, 2026 site visit to an Interim Housing site in CD 4, a service provider representative stated that the site received referrals from LAHSA by email.
- During a July 23, 2026 site visit to a PSH site in CD 14, a property manager stated that referrals are received through several platforms, including Pad Mission and Formstack.
- During an August 31, 2026 site visit to an Interim Housing site in CD 2, a program manager stated that LAHSA sends matches through Calendly.
- During a September 1, 2026 site visit to a PSH site in CD 14, a site manager stated that LAHSA communicated matches through standing biweekly calls and email communications.

Non-Standardized Definitions and Double Counting

During an August 28, 2026 meeting, LAHSA's HMIS team stated that, for the reporting discussed, an individual qualifies as "served" only if the individual is enrolled in a program, assigned to a bed, and spends at least one night at the site. During site visits and meetings with other organizations, site managers and program representatives described the term differently or stated that they did not use it, suggesting variations in operational terminology, program requirements, or stakeholders' understanding of the reporting definition.

- During a July 22, 2026 site visit to an Interim Housing site in CD 13, a program representative stated that the term "served" is not used by the facility in its operations or reporting.
- During a July 22, 2026 site visit to an Interim Housing site in CD 5, program representatives stated that "served" refers to an individual actively enrolled in the program and reflected as such in HMIS.
- During a July 22, 2026 site visit to an Interim Housing site in CD 4, a program representative stated that "served" is the number of people connected to services at a given time. He noted that this does not necessarily mean "occupied," and stated that, even if someone is at the site for just a few days, they are still considered "served."
- During an August 4, 2026 meeting, a SRO representative stated that all residents enrolled in its housing programs are considered actively "served" while they remain enrolled and residing in the program. Upon exiting the program, they cease to be counted as served.

A review of FY 2025-26 Q4 data identified several Interim Housing sites for which cumulative PEH-served totals substantially exceeded the reported number of unit/beds. For example, one Interim Housing site in CD 8 reported 1,154 total PEH served to date, 150 units/beds opened to date, and an open and occupiable date of April 16, 2021. In addition, the aforementioned Interim Housing site in CD 5 reported 94 PEH served in Q2, an increase of 26 from 68 PEH served in Q1, while units/beds remained at 60 in both quarters. Because PEH served figures may be cumulative and individuals may move among sites, programs, or reporting periods, these comparisons do not, standing alone, establish duplicate counting. Stakeholder discussions and Alvarez & Marsal's Independent Assessment of City-Funded Homelessness Assistance Programs ([Dkt. 905](#)) identified duplicate counting of participants among sites as a matter warranting further examination.



During a July 7, 2026 meeting, LAHSA representatives stated that an individual may be counted in more than one reporting quarter or Council District. According to LAHSA, counts of engaged individuals can be deduplicated using the client identification number assigned in HMIS. LAHSA stated that, although it seeks to prevent or merge duplicate client profiles, duplicate profiles and resulting duplicate counts may still occur.

During an August 28, 2026 meeting, a LAHSA representative stated that an individual who resides in both an Interim Housing program and a PSH site during the same reporting period may be counted in both locations. According to the representative, LAHSA does not necessarily regard such reporting as duplicative because individuals may progress through multiple stages of the homelessness-response system, including outreach, Interim Housing, and ultimately PSH. The representative further stated that participant-level data can be deduplicated using HMIS identification numbers.

During a subsequent September 4, 2026 meeting, a LAHSA representative stated that participant counts for Interim Housing are deduplicated across all program enrollments during a single quarter but are not deduplicated across reporting quarters. Accordingly, an individual may be counted in more than one quarterly reporting period but, according to LAHSA, is counted only once within each quarter.

Nardello & Co. also discussed LAHSA's definition of "engaged" during the September 4, 2026 meeting. LAHSA representatives stated that the term refers to a defined level of interaction with a participant, such as developing a case plan or working towards placement in shelter or PSH, rather than providing ad hoc services. The web form LAHSA displayed to Nardello & Co. during this meeting defined "engaged" as an "interactive client relationship [that] results in deliberate client assessment or beginning of a case plan." Nardello & Co. could not independently determine whether all service providers interpreted and applied this definition consistently or whether any differences affected reported engagement counts.

10. RECOMMENDATIONS

Across multiple agencies and service providers, Nardello & Co. identified a reporting environment that relies on numerous databases, self-reported information, manual data transfers, and decentralized reporting practices. Based on observations made during this review, future reporting efforts would benefit from enhanced data integration, additional training for individuals responsible for data entry and reporting, standardized reporting definitions and methodologies, improved documentation and auditability, increased cross-agency reconciliation, and periodic verification measures, including site visits and record reviews. Collectively, these measures may help improve the consistency, transparency, reliability and verifiability of information reported to the CAO's Office and reflected in the City's quarterly reports.

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