



United States Government Accountability Office

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Report to the Chair, Subcommittee on  
Housing, Community Development and  
Insurance, House of Representatives

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November 2021

# HOMELESSNESS

## HUD Should Help Communities Better Leverage Data to Estimate Homelessness

**GAO@100**  
A Century of Non-Partisan Fact-Based Work

# GAO@100 Highlights

Highlights of [GAO-22-104445](#), a report to the Chair, Subcommittee on Housing, Community Development and Insurance, House of Representatives

## Why GAO Did This Study

HUD's PIT count is a key tool for estimating the size of the U.S. homeless population. However, developing an accurate understanding of the extent of homelessness is challenging due to the hidden nature of the population. Further, some members of Congress and others have raised questions about the reliability of HUD's estimates.

GAO was asked to review the PIT count and alternative methods for estimating the size of homeless populations. This report (1) examines communities' approaches for counting people experiencing homelessness and HUD's guidance for using these approaches, (2) describes approaches used by selected foreign countries to estimate their homeless populations, and (3) describes what is known about funding sources and resources expended by selected communities in conducting the PIT count.

GAO conducted a literature review to identify methods to estimate homelessness and selected four countries for case study based on a literature review and recommendations from researchers. GAO also surveyed a nongeneralizable sample of 60 CoCs and received responses from 41 of them about PIT count costs and funding sources, reviewed agency guidance and documents, and interviewed U.S. and foreign government officials.

## What GAO Recommends

GAO recommends that HUD provide CoCs additional information about how they can use administrative data to improve the accuracy of their unsheltered PIT count. HUD agreed with our recommendation.

View [GAO-22-104445](#). For more information, contact Alicia Puente Cackley at (202) 512-8678 or [cackleya@gao.gov](mailto:cackleya@gao.gov).

November 2021

## HOMELESSNESS

### HUD Should Help Communities Better Leverage Data to Estimate Homelessness

#### What GAO Found

The Point-in-Time (PIT) count is a nationwide count of people experiencing homelessness on a single night, conducted by Continuums of Care (CoC)—local planning bodies that coordinate homelessness services. The Department of Housing and Urban Development (HUD) allows CoCs to use different methods to estimate homeless populations—including a census (complete count), sampling, or a combination of these. For counting unsheltered individuals (those on the street or in other uninhabitable places), HUD requires CoCs to use in-person methods—for example, by having enumerators visually locate and attempt to ask questions of these individuals on the night of the count. HUD permits CoCs to also use administrative data—that is, records collected by public and nonprofit agencies on people who use their services. However, HUD does not provide CoCs with examples of how to extract and use administrative data for the unsheltered count. By doing so, HUD could help improve the quality and consistency of CoCs' estimates and position CoCs to provide better estimates, particularly if in-person counts are again disrupted, as they were in 2021, during the COVID-19 pandemic.

The U.S. PIT count is similar to Canada's and England's approaches in that they are nationally administered and localities can choose among various approved methods to conduct in-person local counts. The Netherlands and Australia use more centralized methods and statistical analyses to develop estimates. For example, Australia produces an estimate using data from the general census of the population.

Little comprehensive data exist on PIT count costs, but a GAO survey of 41 CoCs provided information on funding sources and key resources required from their most recent unsheltered PIT count prior to 2021:

- Of the 41 CoCs, 31 used HUD funds, 19 used state or local funds, and 10 used private donations (often in combination with government funds).
- All 41 CoCs reported using volunteers to complete their PIT counts, with large cities using the most volunteer hours.
- Respondents reported an average of 4.8 work hours (paid staff and volunteers) for every person counted in their PIT count of unsheltered individuals. The most common PIT count costs were for incentives for volunteers and meals.

#### Examples of Homeless Encampments in Oakland, California, in 2021



Source: GAO. | [GAO-22-104445](#)

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## Abbreviations

CoC	Continuum of Care
COVID-19	Coronavirus Disease 2019
HMIS	Homeless Management Information System
HUD	Department of Housing and Urban Development
PIT count	Point-in-Time count

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November 22, 2021

The Honorable Emanuel Cleaver, II  
Chair  
Subcommittee on Housing, Community Development and Insurance  
Committee on Financial Services  
House of Representatives

Dear Mr. Chair:

Hundreds of thousands of people are experiencing homelessness in the United States living in shelters or on the streets—potentially in tents, encampments, or sheds. One way the United States measures homelessness is by counting people who are sleeping on the streets or in shelters on a given night, known as a Point-in-Time (PIT) count. However, developing an accurate understanding of the extent of homelessness is challenging, mainly because it is extremely difficult to count people living in cars, abandoned buildings, and other deserted places (some of whom may not wish to be found). Furthermore, estimating the homeless population in 2021 has involved unique challenges because of the Coronavirus Disease 2019 (COVID-19) pandemic, which prevented many communities from conducting an in-person PIT count.

We have previously reported on the limitations of the PIT count, and we and other researchers have found it underestimates the number of people experiencing homelessness.<sup>1</sup> Some policymakers have raised questions about whether the counting approaches currently approved by the Department of Housing and Urban Development (HUD) are providing the necessary data reliability. Additionally, little is known about the costs incurred by local communities to conduct the PIT count.

You asked us to review strengths and limitations of approaches used to count people experiencing homelessness in the United States and alternative approaches, as well as to provide cost information for the PIT count. This report (1) examines communities' approaches for counting people experiencing homelessness and HUD's guidance for using these

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<sup>1</sup>See GAO, *Homelessness: Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population*, [GAO-20-433](#) (Washington, D.C.: July 14, 2020) and Bruce D. Meyer et al., "Learning about Homelessness Using Linked Survey and Administrative Data," (NBER working paper no. 28861, May 2021), accessed June 9, 2021, <https://www.nber.org/papers/w28861>.

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approaches, (2) describes the approaches selected foreign countries use to estimate their homeless populations, and (3) describes what is known about the funding sources and resources expended by selected communities in conducting the PIT count.

To address our first objective, we reviewed federal efforts to estimate the homeless population, including HUD's *Point-in-Time Count Methodology Guide*; HUD data on previous PIT count methodologies; and relevant literature, including our past reports.<sup>2</sup> For our 2020 report on PIT counts, we assessed the quality of 2019 PIT count data by reviewing related documentation and interviewing HUD officials. We reported data from the 2019 PIT count because they remain the most recently available complete data (the unsheltered PIT counts are required in odd-numbered years, and the 2021 count was disrupted by the pandemic). We determined that HUD data on PIT count methodologies were sufficiently reliable for our purposes of identifying which Continuums of Care (CoC)—local planning bodies that coordinate homeless services—used for the 2019 PIT count. Additionally, we assessed HUD guidance on conducting the 2021 PIT count against HUD standards and federal internal control standards.<sup>3</sup> We also interviewed representatives of five CoCs that used administrative data in lieu of in-person counting to estimate the homeless population in their communities and two that did not.

To address our second objective, we conducted a literature search to identify alternative approaches used by researchers and by other countries to estimate homeless populations. We selected the following foreign countries for case study based on the literature results and recommendations from researchers: Canada, England, the Netherlands, and Australia. For each country, we interviewed or received written responses from government officials and researchers about the approaches used. Additionally, we reviewed documentation from the selected countries on their policies and procedures for estimating their homeless populations.

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<sup>2</sup>Department of Housing and Urban Development, *Point-in-Time Count Methodology Guide* (Washington, D.C.: September 2014), [GAO-20-433](#) and GAO, *Homelessness: A Common Vocabulary Could Help Agencies Collaborate and Collect More Consistent Data*, [GAO-10-702](#) (Washington, D.C.: June 30, 2010).

<sup>3</sup>Department of Housing and Urban Development, *Point-in-Time Count Methodology Guide* and GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

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To address our third objective, we sent a questionnaire about costs associated with conducting the PIT count to a nongeneralizable sample of 60 CoCs. To achieve diversity in size and geography, we selected the 10 CoCs with the largest reported homeless populations and randomly selected an additional 50 CoCs distributed across geographic regions and CoC types (major city, urban, suburban, and rural). We received 41 completed questionnaires. To address all three objectives, we reviewed relevant laws, regulations, and HUD documents and interviewed officials from HUD, the U.S. Interagency Council on Homelessness, and the Census Bureau. Appendix I provides more information on our scope and methodology.

We conducted this performance audit from July 2020 to November 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

Multiple federal agencies collect data on subpopulations experiencing homelessness, but HUD is the only agency that compiles data to provide annual estimates of the number of people experiencing homelessness in the United States.<sup>4</sup> HUD publishes the data in its Annual Homeless Assessment Reports to Congress.<sup>5</sup> While the Census Bureau enumerates people experiencing homelessness as part of the overall national population count for the decennial census, Census Bureau officials told us that they do not tabulate a distinct count of people experiencing homelessness in the United States and that HUD's data are the authoritative nationwide estimates of homelessness.<sup>6</sup>

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<sup>4</sup>For example, the Department of Education collects data on children and youth experiencing homelessness through the Education for Homeless Children and Youth program.

<sup>5</sup>For HUD's Annual Homeless Assessment Reports, see <https://www.hudexchange.info/homelessness-assistance/ahar/#2020-reports>.

<sup>6</sup>For more information on the Census Bureau's activities related to hard-to-count populations, see GAO, *2020 Census: Update on the Census Bureau's Implementation of Partnership and Outreach Activities*, GAO-20-496 (Washington, D.C.: May 13, 2020) and *2020 Census: Actions Needed to Address Challenges to Enumerating Hard-to-Count Groups*, GAO-18-599 (Washington, D.C.: July 26, 2018).

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## HUD's Continuums of Care

HUD's Office of Special Needs Assistance Programs provides grants to communities to serve vulnerable populations who are experiencing homelessness or are at risk of homelessness. This office administers HUD's CoC program, which is the largest federal homelessness assistance program. HUD's data collection efforts are built into its CoC program.<sup>7</sup> A CoC is a regional or local planning body that coordinates homelessness response funding and provides homelessness services in a geographic area.<sup>8</sup> CoCs are responsible for planning homelessness services, setting local priorities, and collecting and reporting homelessness data. As of January 2021, there were 389 CoCs that covered virtually the entire United States and its territories. CoCs vary in size and population density and represent areas that are rural, suburban, urban, and major cities.<sup>9</sup> Most CoCs are categorized as suburban or rural (44 and 29 percent, respectively); however the majority of individuals experiencing homelessness live in major city CoCs (52 percent), according to PIT count data (see fig. 1).

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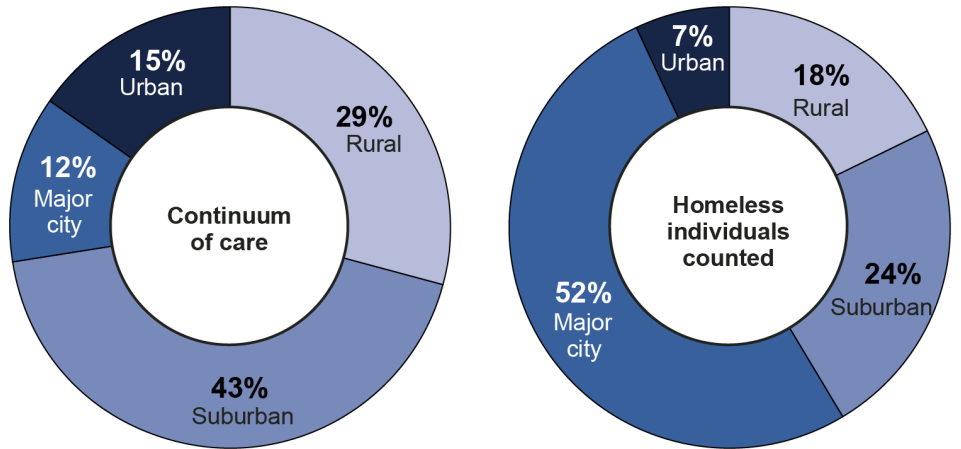
<sup>7</sup>The CoC program interim rule, 24 C.F.R pt 578, governs the CoC grant program. The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 amended the McKinney-Vento Homeless Assistance Act and consolidated three separate homeless assistance programs into a single grant program known as the CoC program.

<sup>8</sup>CoCs may include representatives of several organizations, such as nonprofit homeless providers, faith-based organizations, local governments, public housing agencies, and social service providers.

<sup>9</sup>HUD categorizes CoCs into four groups: major city, other largely urban, largely suburban, and largely rural. For the purposes of this report, we refer to these CoC types as major city, urban, suburban, and rural, respectively. Rural CoCs may include "balance of state" CoCs, which comprise all jurisdictions in a state that are not covered by any other CoC and may include nonmetropolitan areas or all of the state's smaller cities.



**Figure 1: Distribution of Continuums of Care and Observed Homeless Population, 2019**



Source: Department of Housing and Urban Development. | GAO-22-104445

Note: Excludes Puerto Rico and U.S. Territories. Due to rounding, some percentages may not add up to 100.

## Data Sources for the U.S. Homeless Population Count

HUD has two primary data sources it uses to estimate the size of the U.S. homeless population: the PIT count and Homeless Management Information System (HMIS) databases.

- PIT count.** HUD requires CoCs to count sheltered individuals (those in emergency shelters, transitional housing programs, or safe haven projects) annually and to count unsheltered individuals (those on the street or in other places not suitable for human habitation) at least every 2 years.<sup>10</sup> HUD uses the definition of homelessness in the McKinney-Vento Act, which defines a homeless individual, in part, as someone who lacks a fixed, regular, and adequate nighttime

<sup>10</sup>HUD defines the Point-in-Time count as “a count of sheltered and unsheltered homeless persons carried out on one night in the last 10 calendar days of January or at such other time as required by HUD.”

**Examples of Locations Where People May Be Counted during the Point-in-Time Count**



Source: GAO | GAO-22-104445

During the point-in-time count, enumerators count people experiencing homelessness in unsheltered locations, shown above, and sheltered locations, shown below.



Source: GAO. | GAO-22-104445

residence.<sup>11</sup> (See sidebar for examples of sheltered and unsheltered locations counted during the PIT count.)

- **HMIS databases.** An HMIS database is an information technology system that communities use to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. HMIS data capture information about both sheltered and unsheltered persons.<sup>12</sup> Unlike the PIT count, which is a snapshot from one night, CoCs collect HMIS data throughout the year. We have previously reported that the HMIS databases have some limitations but provide relatively reliable

<sup>11</sup>42 U.S.C. § 11302(a). For the CoC program, HUD’s definition of “homeless” encompasses four categories: (1) individuals and families who lack a fixed, regular, and adequate nighttime residence, which includes those residing in places not meant for human habitation or in shelters, as well as those who resided in an emergency shelter or a place not meant for human habitation and who are exiting an institution where they temporarily resided; (2) individuals and families who will imminently lose their primary nighttime residence; (3) unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless; and (4) individuals and families who are fleeing, or are attempting to flee, dangerous or life-threatening conditions, such as domestic violence. 24 C.F.R. § 578.3. The PIT count essentially covers those homeless individuals and families in the first category. See Department of Housing and Urban Development, *Point-in-Time Count Methodology Guide*.

<sup>12</sup>HMIS databases primarily collect data on persons experiencing sheltered homelessness, and CoCs vary in whether and the degree to which they add unsheltered individuals to their HMIS databases.

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information on homelessness.<sup>13</sup> Further, we previously identified several strengths of HMIS, including that the data are continuously collected throughout the year and, as a result, provide greater insight into trends over time; the data are collected on a more granular level than the PIT count data; and the data are a comprehensive source of information on sheltered homelessness.

Additionally, HUD requires CoCs to perform an annual Housing Inventory Count at the same time as the PIT count, which provides information on the number of units and beds dedicated to housing homeless or formerly homeless persons.

HUD requires that CoCs conduct PIT counts in compliance with HUD counting standards and methodology guidance, as described in HUD's *Point-in-Time Count Methodology Guide*.<sup>14</sup> HUD's standards require CoCs to use HMIS as the primary data source for the sheltered PIT count and to supplement this information with client surveys if HMIS data are insufficiently complete.<sup>15</sup> As described in more detail later in this report, HUD's methodology guide includes two approved approaches for the unsheltered count, both of which involve in-person counting: (1) one-night counts of all of a CoC's geography, and (2) one-night counts of a selection of a CoC's geography. HUD allows CoCs to use these two in-person counting approaches alone or in combination with other approaches and allows CoCs to use administrative data to supplement their unsheltered PIT count in some circumstances. Administrative data, in the context of counting people experiencing homelessness, are records collected by public and nonprofit agencies on services provided and the people who use them.

Because it is an odd-numbered year, CoCs would have been required to conduct an unsheltered PIT count in January 2021. However, because of the COVID-19 pandemic, HUD allowed CoCs to apply for a waiver to opt

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<sup>13</sup>[GAO-20-433](#).

<sup>14</sup>Department of Housing and Urban Development, *Point-in-Time Count Methodology Guide*.

<sup>15</sup>Throughout this report, we refer to surveys to mean paper or electronic instruments with questions used to collect information from respondents.

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out of conducting an in-person unsheltered PIT count.<sup>16</sup> Alternatively, CoCs could ask HUD if they could use a different approach that would not normally meet data standards because it did not include in-person counting. Such an approach might use administrative data from HMIS or a visual count without the use of a survey.<sup>17</sup> Administrative data may also refer to databases specific to people experiencing homelessness, such as HMIS or others. According to HUD, in 2021, 58 percent of CoCs conducted an unsheltered PIT count, while the remaining 42 percent requested a waiver and did not conduct a count. Of those that did do a 2021 PIT count, HUD approved 9 percent—20 CoCs—to estimate their PIT count primarily using administrative data without doing any in-person counting.

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## Continuum of Care Funding

HUD awards grants for projects that fall under a variety of program components, such as CoC planning, permanent housing, supportive services, and transitional housing. Total grants awarded to CoCs increased slightly each year over the past 5 years and were approximately \$2.5 billion in fiscal year 2020 (see table 1). HUD awards competitive grants to CoCs based on its annual notice of funding opportunity. Through these notices, HUD has historically incentivized annual unsheltered PIT counts by awarding additional points to CoCs that collect data annually even when it was not a required year for an unsheltered count.<sup>18</sup> Because of the COVID-19 pandemic, funds appropriated for fiscal year 2020 were distributed through a noncompetitive process and HUD renewed grant awards made in the previous fiscal year to CoCs.<sup>19</sup> In August 2021, HUD announced \$2.7

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<sup>16</sup>Department of Housing and Urban Development, Office of Community Planning and Development, *Availability of Waivers for the Biennial Point-in-Time Count of Unsheltered Homelessness* (Washington, D.C.: January 2021).

<sup>17</sup>Department of Housing and Urban Development, Office of Community Planning and Development, *Conducting the 2021 Unsheltered PIT Count* (Washington, D.C.: November 2020).

<sup>18</sup>In January 2018, even though it was not a required year for an unsheltered count, 87 percent of CoCs conducted an unsheltered PIT count.

<sup>19</sup>In March 2020, Congress appropriated an additional \$4 billion to the Emergency Solutions Grant program in the CARES Act. Officials told us that while this allocation might affect the ability of CoCs to fund activity associated with the PIT count, CoCs were not the direct recipients of the funds. For more information see GAO, *COVID-19: Additional Risk Assessment Actions Could Improve HUD Oversight of CARES Act Funds*, [GAO-21-104542](#) (Washington, D.C.: Sept. 30, 2021).

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billion in available funds for the fiscal year 2021 CoC program competition.<sup>20</sup>

**Table 1: HUD Grant Awards to Continuums of Care, by Fiscal Year**

Dollars in millions

Fiscal year	Funding awarded
2016	1,957
2017	2,033
2018	2,166
2019	2,287
2020	2,470

Source: Department of Housing and Urban Development (HUD). | GAO-22-104445

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## Communities Use Various Approaches to Estimate Homelessness, but HUD Provides Limited Information on Using Administrative Data

HUD's *Point-in-Time Count Methodology Guide* describes two primary approaches for conducting the PIT count—census and sampling—both of which include in-person counting. Each of these approaches offers various strengths and limitations, and CoCs may use them in combination. While HUD allows CoCs to use administrative data in combination with in-person counting, it does not provide CoCs tools or information for how to use administrative data for the unsheltered PIT count.

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## CoCs Use Census, Sampling, or Both Approaches to Conduct the PIT Count

According to HUD's *Point-in-Time Count Methodology Guide*, CoCs may attempt to count everyone experiencing homelessness through a census approach, a sampling approach, or a combination of these two approaches.

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<sup>20</sup>For HUD's CoC funding availability, see <https://www.hudexchange.info/programs/e-snaps/fy-2021-coc-program-nofa-coc-program-competition/>.

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## Census

### Counting People Experiencing Unsheltered Homelessness



Staff in the Department of Housing and Urban Development's Philadelphia Regional Office count people experiencing unsheltered homelessness as part of the 2020 point-in-time count.

Source: Department of Housing and Urban Development | GAO-22-104445

A census is a complete count of all people and does not involve estimation.<sup>21</sup> HUD allows CoCs to use this approach for both the sheltered and unsheltered PIT counts. For the sheltered count, CoCs count all people experiencing homelessness in all sheltered locations, such as emergency shelters. For the unsheltered count, the *Point-in-Time Count Methodology Guide* allows CoCs to conduct a “complete coverage” count. For this approach, the CoC sends enumerators throughout the entire geography of the CoC, searching for and counting all people who are living in places not meant for human habitation—such as streets, cars, abandoned buildings, or parks. According to HUD data, 58 percent of CoCs used a complete coverage count in 2019.<sup>22</sup>

The main strength of the census approach is that it provides the most complete and accurate information available, according to HUD's *Point-in-Time Count Methodology Guide*. However, limitations include that it can be difficult and resource intensive to count and survey all people experiencing homelessness throughout the entire geography of a CoC. People experiencing unsheltered homelessness in particular may be difficult to locate because they may be seeking to conceal themselves, such as for safety. Also, communities must complete the count within a short period—typically over the course of one night—which limits the amount of detailed information communities can collect.

## Sampling

Sampling is an approach to counting that involves estimating the number and characteristics of all people experiencing homelessness by collecting data about a portion of that full group and using this information to draw conclusions about the full group. CoCs may use sampling for both the sheltered and unsheltered counts. For example, HUD recommends CoCs use sampling approaches for the sheltered count when they do not have sufficient data in HMIS.

For the unsheltered count, HUD recently provided CoCs with additional information about how to use a sampling approach called geographic sampling.<sup>23</sup> Geographic sampling involves using geographic areas within

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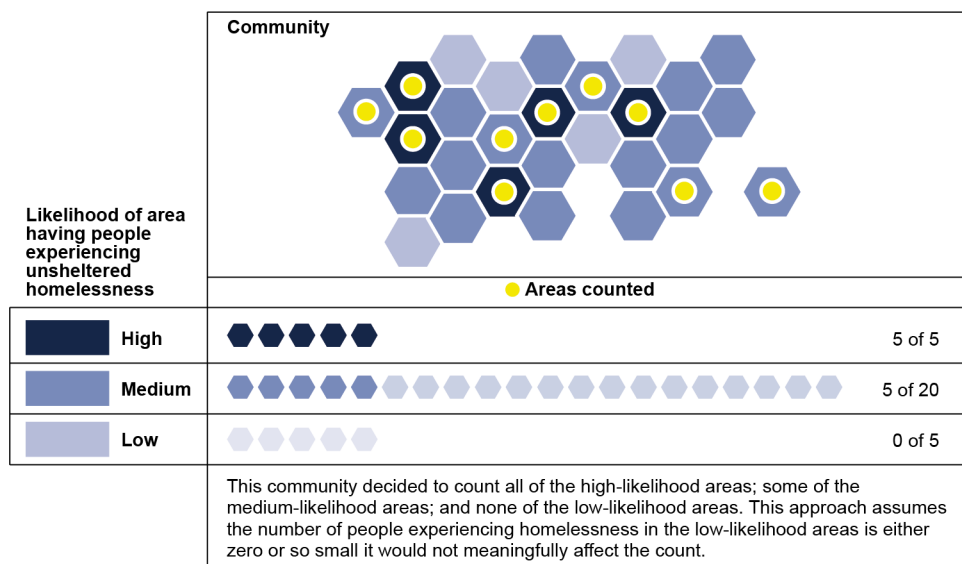
<sup>21</sup>For the purposes of this report, “census” refers to an approach to counting people experiencing homelessness.

<sup>22</sup>Throughout the report, we use 2019 PIT count data because they are the most complete data available for recent years, given that the COVID-19 pandemic disrupted the 2021 unsheltered count and 2020 was not a required year.

<sup>23</sup>Department of Housing and Urban Development, *How to Use Sampling within a CoC to Conduct an Unsheltered Point-in-Time (PIT) Count* (Washington, D.C.: November 2020). HUD does not collect data on the number of CoCs that use geographic sampling.

the CoC as the basis for selection. Knowledgeable people, such as homeless service providers, categorize geographic areas within a community as having a high, medium, or low likelihood of having persons experiencing homelessness. Areas with a high likelihood are generally sampled at higher rates. Enumerators go in person to the sampled areas to count the number of people experiencing unsheltered homelessness. According to HUD's *Point-in-Time Count Methodology Guide*, after the count, the results from the sampled areas are to be weighted to represent the areas with the same likelihood that were not sampled. Figure 2 is an illustrative example of geographic sampling.

**Figure 2: Illustrative Example of Geographic Sampling Used to Count Persons Experiencing Homelessness**



Source: GAO. | GAO-22-104445

The geographic sampling approach has some advantages compared to a census approach. Because it focuses the count in areas known to have a high likelihood of people experiencing homelessness, this approach can take less time than a census and require fewer staff and volunteers to conduct.

However, this approach also has limitations. First, because this approach involves sampling and is not a complete count, it results in an estimate with some uncertainty (i.e., a margin of error). Second, sampling bias may occur because it can be difficult to accurately determine the likelihood of areas having people experiencing homelessness. Specifically, if the



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geographic areas are not correctly categorized, the sample will yield an inaccurate estimate that does not represent the entire geography.<sup>24</sup> Third, areas with a low likelihood of having unsheltered persons may not be included at all because of limited resources, which could lead to an undercount and subsequently an underestimate of the homeless population.<sup>25</sup>

Our literature review also identified two other sampling approaches that researchers and other countries use to develop estimates of people experiencing homelessness:

- **Person-level sampling** involves sampling households or persons from the general population and interviewing respondents about their homelessness history to determine if they should be included in the count—for example, through telephone surveys. Similar to geographic sampling, responses are weighted according to the sample design to obtain an estimate of persons who have experienced homelessness. For example, researchers used a nationally representative telephone survey to estimate the prevalence of prior experiences of homelessness in eight European countries.<sup>26</sup>
- **Service-based sampling** involves surveying all or a portion of programs likely to serve people experiencing unsheltered homelessness. Service programs that do not provide housing but provide services to unsheltered people (such as soup kitchens or day shelters) ask all or a sample of their clients where they slept the previous night or over the course of a week. Based on the proportion of respondents who say they were unsheltered, researchers estimate the total number of persons who might be unsheltered. For example, Denmark, Norway, and Sweden use this method to develop national

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<sup>24</sup>Sampling bias occurs when the sampled counts obtained do not reflect those that would have been obtained if all areas were counted. For example, if one area is sampled to represent five areas and then later it is realized that construction or roadwork made part of this area inaccessible to enumerators or other factors led to a lower count in the sampled area, the sampled area might not adequately represent all five areas. See [GAO-20-433](#), p. 23.

<sup>25</sup>See, for example, Volker Busch-Geertsema, Dennis Culhane, and Suzanne Fitzpatrick, “Developing a Global Framework for Conceptualising and Measuring Homelessness,” *Habitat International*, vol. 55 (2016): pp. 124–132.

<sup>26</sup>Owen Taylor et al., “Lifetime, 5-Year and Past-Year Prevalence of Homelessness in Europe: A Cross-National Survey in Eight European Nations,” *BMJ Open* (2019).



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estimates of the population of people experiencing homelessness.<sup>27</sup> Service-based sampling is also used to refine estimates obtained through census or sampling approaches.<sup>28</sup>

### Combination of Approaches

HUD allows CoCs to use a combination of approaches to complete their count. For example, CoCs with suburban or rural geography may conduct a census count in a limited number of locations and use sampling techniques to account for areas with a lower likelihood of encountering people experiencing unsheltered homelessness. A “known locations” approach allows CoCs to use the census approach in specific locations within the CoC. With a known locations approach, communities identify locations where people experiencing unsheltered homelessness are known to be located at night and send enumerators to specific neighborhoods or other geographies within the CoC to count people in those locations. According to HUD data, 65 percent of CoCs used a known locations approach for the unsheltered count in 2019, either alone or in combination with other approaches.

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### HUD Provides CoCs with Limited Tools and Information for Using Administrative Data in Their PIT Counts

Historically, HUD has allowed CoCs to use administrative data such as HMIS data to differing degrees for the sheltered and unsheltered PIT counts.<sup>29</sup> For example, HUD’s *Point-in-Time Count Methodology Guide* instructs CoCs to use HMIS as the primary data source for the sheltered PIT count, and a large majority do. In 2019, 86 percent of CoCs used HMIS data either alone or in combination with other methods for the sheltered count. For the unsheltered PIT count, CoCs can use HMIS data only in conjunction with traditional in-person street counting approaches (census or geographic sampling described previously). CoCs have used HMIS data for the unsheltered count to a lesser extent than the sheltered count—in 2019, 22 percent of CoCs used HMIS data for the unsheltered PIT count (in conjunction with an in-person counting method).

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<sup>27</sup>Magdalena Mostowska, “Metaphors and Evidence. Producing Numbers in National Homelessness Counts,” *Housing, Theory and Society*, vol. 37 no. 3 (2020) 339–356.

<sup>28</sup>See Busch-Geertsema, Culhane, and Fitzpatrick, “Developing a Global Framework.”

<sup>29</sup>As previously noted, administrative data are records collected by public and nonprofit agencies on services provided and the people who use them. For example, CoCs are required to maintain an HMIS database, which includes client-level data such as name, Social Security number, and race for all individuals using services. CoCs may maintain administrative databases in addition to HMIS. For example, CoCs may use databases outside of HMIS to collect assessment data on people experiencing homelessness.

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For the first time, because of health and safety concerns related to the pandemic, HUD relaxed its data standards and did not require CoCs to conduct in-person counting for their unsheltered PIT count in 2021. HUD gave CoCs the option of conducting no count at all, modifying their in-person counting approach, or using administrative data instead of performing an in-person unsheltered count.<sup>30</sup> HUD approved 20 CoCs to estimate their PIT count primarily using administrative data in lieu of any traditional in-person counting approach, although many of these CoCs conducted additional street outreach to improve unsheltered data prior to the count period.

CoCs individually determined how they would use administrative data and met with HUD on a case-by-case basis to explain their approach, according to interviews with five of the 20 CoCs approved to use this approach. We found the approaches used by some of these five CoCs varied. For example:

- One CoC used HMIS data to estimate the average length of time people experienced unsheltered homelessness in the community and then to exclude individuals unlikely to have experienced unsheltered homelessness during the count period.
- A second CoC used HMIS data to develop its estimate but also had street outreach workers attempt to contact everyone expected to be unsheltered during the count period to verify they were in fact experiencing unsheltered homelessness.
- A third CoC did not use HMIS and instead used a list of unsheltered individuals developed by street outreach workers, who conducted extensive outreach prior to the count to ensure the list accurately reflected people experiencing unsheltered homelessness.

The five CoC administrators we spoke to said that using administrative data for their 2021 unsheltered counts improved the counts' accuracy and completeness. They noted data quality benefited from use of professional outreach staff, instead of volunteers, to connect with people experiencing unsheltered homelessness in the weeks before the count. Three of the five CoC administrators also said that in their view their HMIS databases,

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<sup>30</sup>Department of Housing and Urban Development, Office of Community Planning and Development, *Availability of Waivers and Conducting the 2021 Unsheltered PIT Count*.

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which are regularly or frequently updated, provided more accurate and complete counts than the in-person counts used in prior years.<sup>31</sup>

However, HUD does not provide CoCs with information, tools, or examples specific to using administrative data in their unsheltered PIT counts. HUD does provide CoCs with tools and information on topics related to the PIT count more generally. For example, HUD developed a data crosswalk to help CoCs report their HMIS data in their sheltered PIT counts.<sup>32</sup> But HUD has not provided similar information on how to use administrative data for unsheltered PIT counts.

CoC administrators we spoke with told us such information would be helpful. For example, one said more support from HUD about the best ways to collect administrative data for future unsheltered counts would provide greater confidence in estimates. Representatives of another CoC told us that while they considered using administrative data for their unsheltered count during the pandemic, they ultimately could not figure out how to do so and therefore requested a waiver to not conduct any count in 2021. Specifically, they said HUD's guidance did not sufficiently describe how to extract data from HMIS to develop an unsheltered count.

HUD officials told us they did not produce information for CoCs on using administrative data for unsheltered counts because allowing sole use of such data was a one-time exception resulting from the pandemic. Officials said they met with CoCs on a case-by-case basis if they wanted to use that method during the pandemic. However, tools or information on how to use administrative data for unsheltered counts in combination with in-person counting methods could be helpful for CoCs, particularly if any future circumstances do not allow for robust in-person counts. In addition, such tools or information could help ensure more consistent and comparable data. We previously reported that methodological variation makes it challenging to compare or aggregate across different CoCs' PIT counts.<sup>33</sup>

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<sup>31</sup>We previously report that the PIT count likely underestimates homelessness overall, and unsheltered homelessness in particular. See [GAO-20-433](#), p. 19.

<sup>32</sup>Department of Housing and Urban Development, *Sheltered PIT Count and HMIS Data Element Crosswalk* (Washington, D.C.: April 2018).

<sup>33</sup>[GAO-20-433](#).

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According to HUD’s Point-in-Time Count Methodology Guide, the PIT count should provide valid and reliable results. In addition, federal internal control standards state that management should externally communicate the necessary quality information to achieve the entity’s objectives.<sup>34</sup> By providing CoCs with information about how to use administrative data for unsheltered counts—such as examples of using HMIS for this purpose—HUD could better ensure this approach is applied consistently and data are comparable across different CoCs. This also would better position CoCs to use administrative data if disruption of in-person PIT counts were to occur again, as it did during the COVID-19 pandemic.

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## Canada and England Allow Localities to Choose Among Methods, While the Netherlands and Australia Conduct Statistical Analysis

The four selected foreign countries we reviewed count people experiencing homelessness in various ways. Canada and England allow localities to choose among counting methods, similar to the PIT count in the United States, while the Netherlands and Australia use a uniform national effort led by a statistical agency.

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### Canada

Canada conducted a nationally coordinated homelessness count in 2016 and 2018, and to some extent in 2020, although the COVID-19 pandemic disrupted the 2020 count.<sup>35</sup> Officials said that communities are not required to conduct counts, but the Canadian federal government does offer funding to participating communities.<sup>36</sup> In 2018, many communities

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<sup>34</sup>[GAO-14-704G](#).

<sup>35</sup>Canadian officials said that because of the COVID-19 pandemic, the 2020 count has been extended to 2021 and possibly into 2022. For more information about Canada’s count, see the Government of Canada’s Employment and Social Development department at <https://www.canada.ca/en/employment-social-development.html>.

<sup>36</sup>Canadian officials told us that while the 2016 and 2018 counts were voluntary for communities and supported financially by the Canadian government, the 2020 count was mandatory for some communities and they could use their federal funding to support the counts.

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conducted counts, mainly covering urban and more densely populated areas of Canada, according to officials.<sup>37</sup>

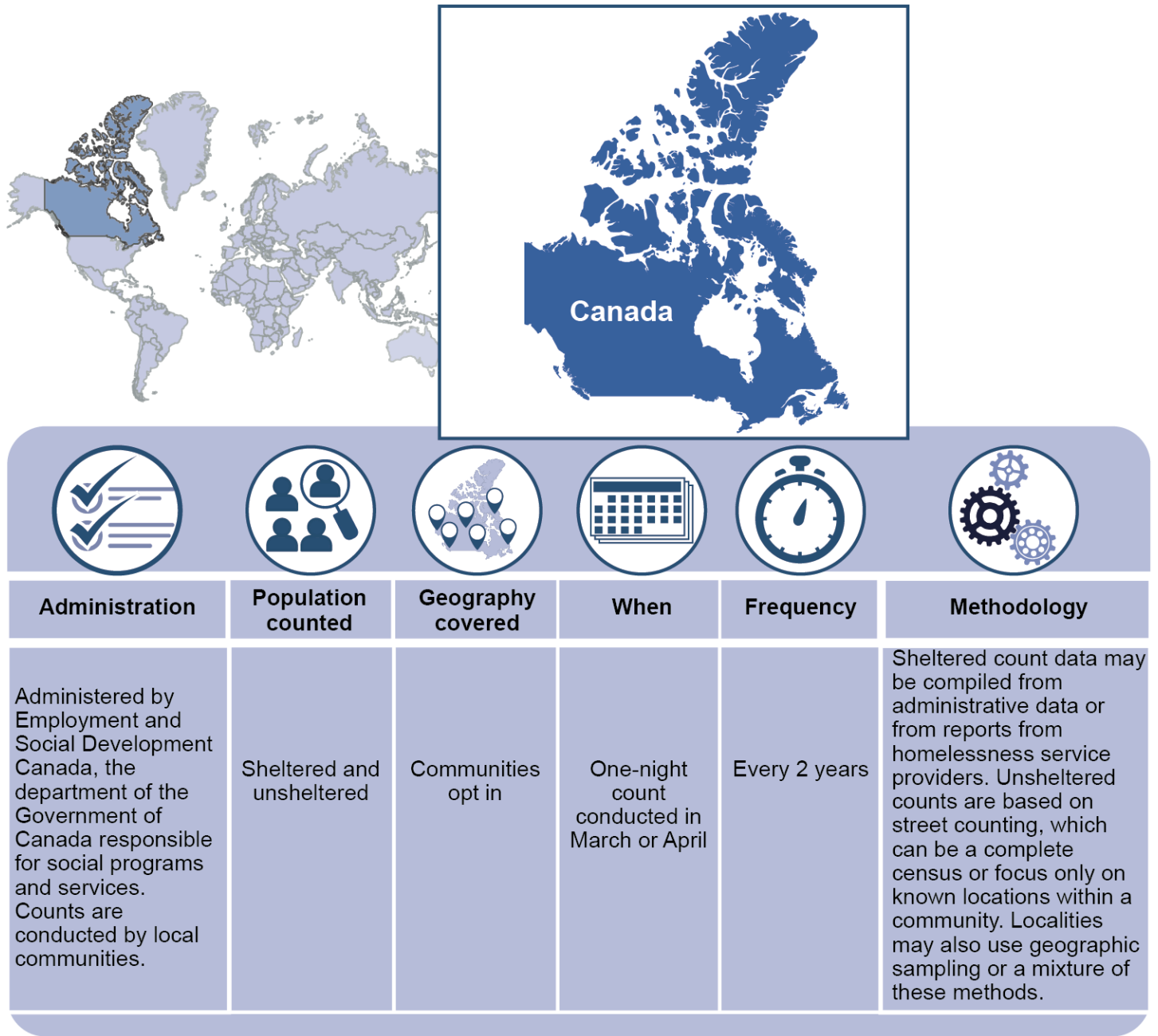
Communities may choose among different methods for the sheltered and unsheltered counts but must adhere to a set of standards, including a standard set of screening and survey questions that enumerators ask across communities.<sup>38</sup> For sheltered counts, communities may submit administrative data through data systems or a report from homelessness service providers. For unsheltered counts, communities use a traditional street counting method, which can be a census of an entire community or focus only on known locations—similar to the U.S. PIT count. Localities may also use geographic sampling or a mixture of these methods. Figure 3 summarizes selected attributes of Canada’s count.

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<sup>37</sup>Officials said that in 2018, the count was conducted by 61 communities that account for the majority of urban areas in Canada and represent a mix of municipalities and regions. The 61 communities are funded through Canada’s federal homelessness program. For more information, see <https://www.canada.ca/en/employment-social-development/services/funding/homeless.html>.

<sup>38</sup>For more information about the standards, see <https://www.canada.ca/en/employment-social-development/programs/homelessness/reports/guide-point-in-time-counts.html>. For the results of Canada’s most recent count, see Employment and Social Development Canada, *Everyone Counts Highlights: Preliminary Results from the Second Nationally Coordinated Point-in-Time Count of Homelessness in Canadian Communities* (Canada: 2019).

**Figure 3: Attributes of Canada’s Count of People Experiencing Homelessness**



Source: GAO; Map Resources. | GAO-22-104445

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One benefit of Canada’s count is that for many communities it is the only source of community-wide data on people experiencing homelessness, according to government officials. It also can provides information that is not otherwise available, such as information on the health conditions of people experiencing homelessness (which will be collected as part of the next count). In addition, communities have the flexibility to tailor the method used to best meet the circumstances of their locality. For example, the government’s guidance indicates that communities should determine what methods to use based on their geography, the size of the area, and the resources available.

Limitations of Canada’s count include limited geographic coverage because not all communities take part (cities have much higher participation than rural or remote communities ), which limits how results can be used to understand homelessness nationally, according to Canadian officials.<sup>39</sup> Also, methodological variation affects the degree to which results can be compared across communities. Finally, Canada conducts the one-night count in March or April, and adverse weather (e.g. blizzards or storms) can affect the count.

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## England

England conducts an official annual estimate of people experiencing unsheltered homelessness on a single night in October or November that is commonly referred to as a rough sleeping snapshot.<sup>40</sup> Additionally, a nongovernmental organization manages and independently verifies the results.<sup>41</sup> Local areas across England may conduct a complete census of the community—such as by visually identifying people, sampling specific geographic areas, working with local partner organizations to use existing administrative data from service providers, or using a combination of

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<sup>39</sup>Officials told us that the Canadian count methodology may not be well suited for some areas of the country that are sparsely populated.

<sup>40</sup>For results from England’s most recent count, see UK Ministry of Housing, Communities & Local Government, *Rough Sleeping Snapshot in England: Autumn 2020* (London, England: Feb. 25, 2021). Other nations in the United Kingdom publish their own statistics on homelessness, which contain information on unsheltered homelessness. The figures are not directly comparable between countries as they have different methodologies and coverage and are carried out at different time periods. For more information about England’s count, see the UK Government’s Ministry of Housing, Communities & Local Government at <https://www.gov.uk/government/organisations/ministry-of-housing-communities-and-local-government>.

<sup>41</sup>For more information about the nongovernmental organization, see <https://www.homeless.org.uk/>.

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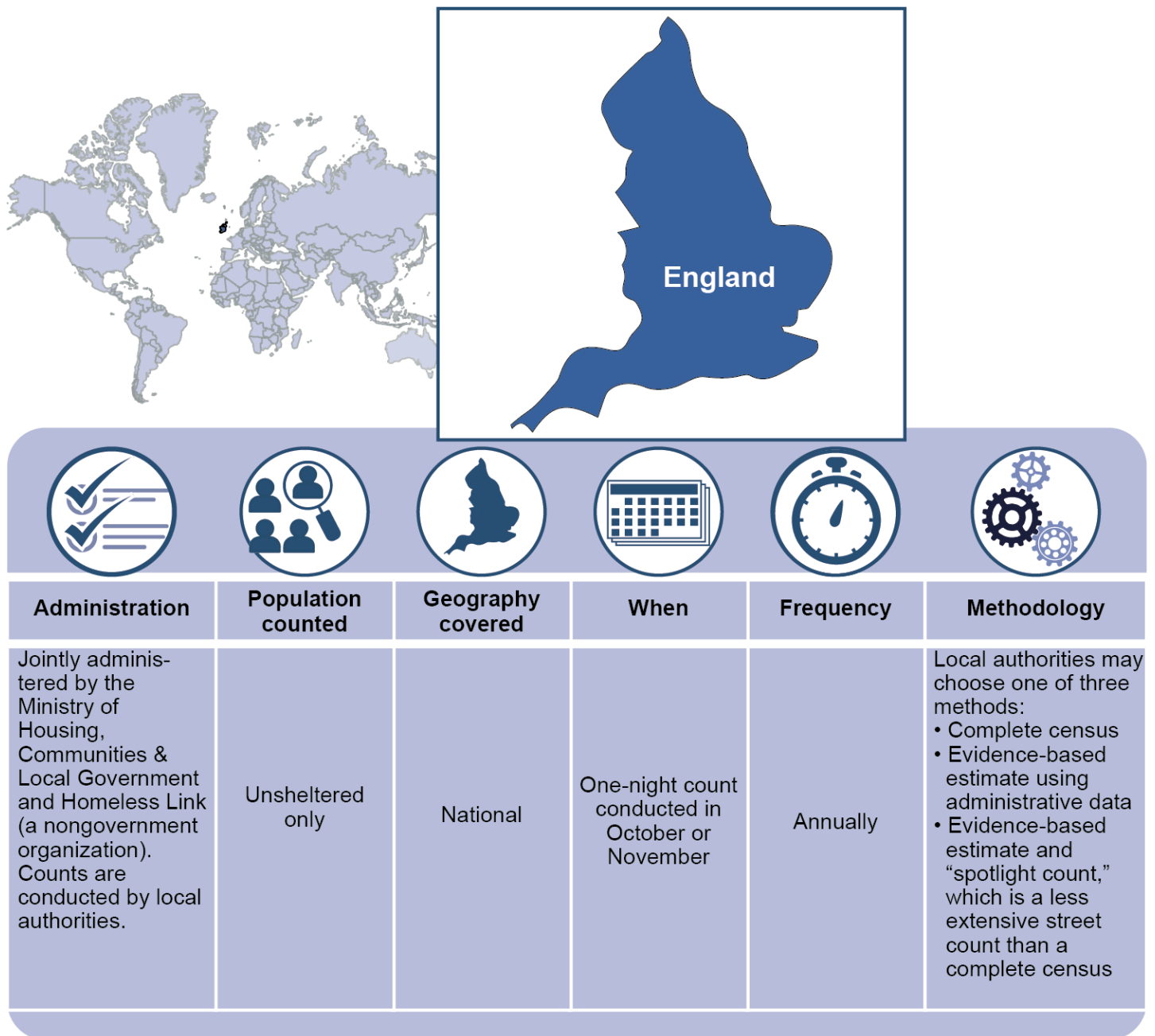
approaches. Local authorities, together with local agencies, decide which approach and specific date to use for their one-night estimate. Local areas are advised to use the approach that will provide the most accurate estimate in their area. Figure 4 summarizes selected attributes of England's one-night estimate.<sup>42</sup>

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<sup>42</sup>While England does not estimate the number of sheltered individuals experiencing homelessness on the night of the rough sleeping snapshot, it does estimate the number of individuals living in temporary accommodations based on data submitted by local authorities through the Homelessness Case Level Information Collection data system. For more information, see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004845/Statutory\\_homelessness\\_release\\_Jan-Mar\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004845/Statutory_homelessness_release_Jan-Mar_2021.pdf).



**Figure 4: Attributes of England’s One-Night Estimate of People Experiencing Homelessness**



Source: GAO; Map Resources. | GAO-22-104445

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While localities in England may use a variety of methods, officials said a key strength is that the approved methods used have remained consistent since 2010, which allows comparison of results over time. Also, a nongovernmental organization provides quality control by verifying certain aspects of localities' estimates, including approving any changes to methods and verifying that the method selected is the most robust available. For example, if a locality decides to change its approach from a census to an estimate based on administrative data, it must provide a reason why a change would provide a more robust estimate.

According to government officials, a limitation of England's approach is that while the nongovernmental organization and national government provide oversight and training, the 314 localities may interpret guidance differently, which could affect data quality. Officials told us administrators have taken steps to address this and have developed additional resources for localities. Additionally, government officials told us their count only includes individuals able to be seen and identified on the night of the estimate, so the estimate is likely an undercount. Also, England conducts the one-night count in the fall, and the count can be affected by unseasonably warm or cold weather.

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## The Netherlands

The Netherlands' national statistical agency applies an estimation technique to three administrative data sources to derive an estimate of people experiencing unsheltered homelessness.<sup>43</sup> This approach uses a method known as capture-recapture. Capture-recapture uses two or more independent observations or administrative lists of the same "hidden" population to generate estimates of the total population, including the unobserved part. Under this method, an initial sample of persons experiencing homelessness is obtained ("captured")—for example, by surveying people about their housing status in areas where unsheltered homelessness may be prevalent, such as near a soup kitchen. This method is then repeated independently at a different time (perhaps a month later) to obtain a second sample. The number of persons from the initial sample who appear in the second sample is counted ("recaptured"). The total population is estimated from the initial captured sample and the

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<sup>43</sup>For more information about the Netherlands' count, see Statistics Netherlands at <https://www.cbs.nl/en-gb>.

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second independent captured sample, and the number of recaptured persons.<sup>44</sup>

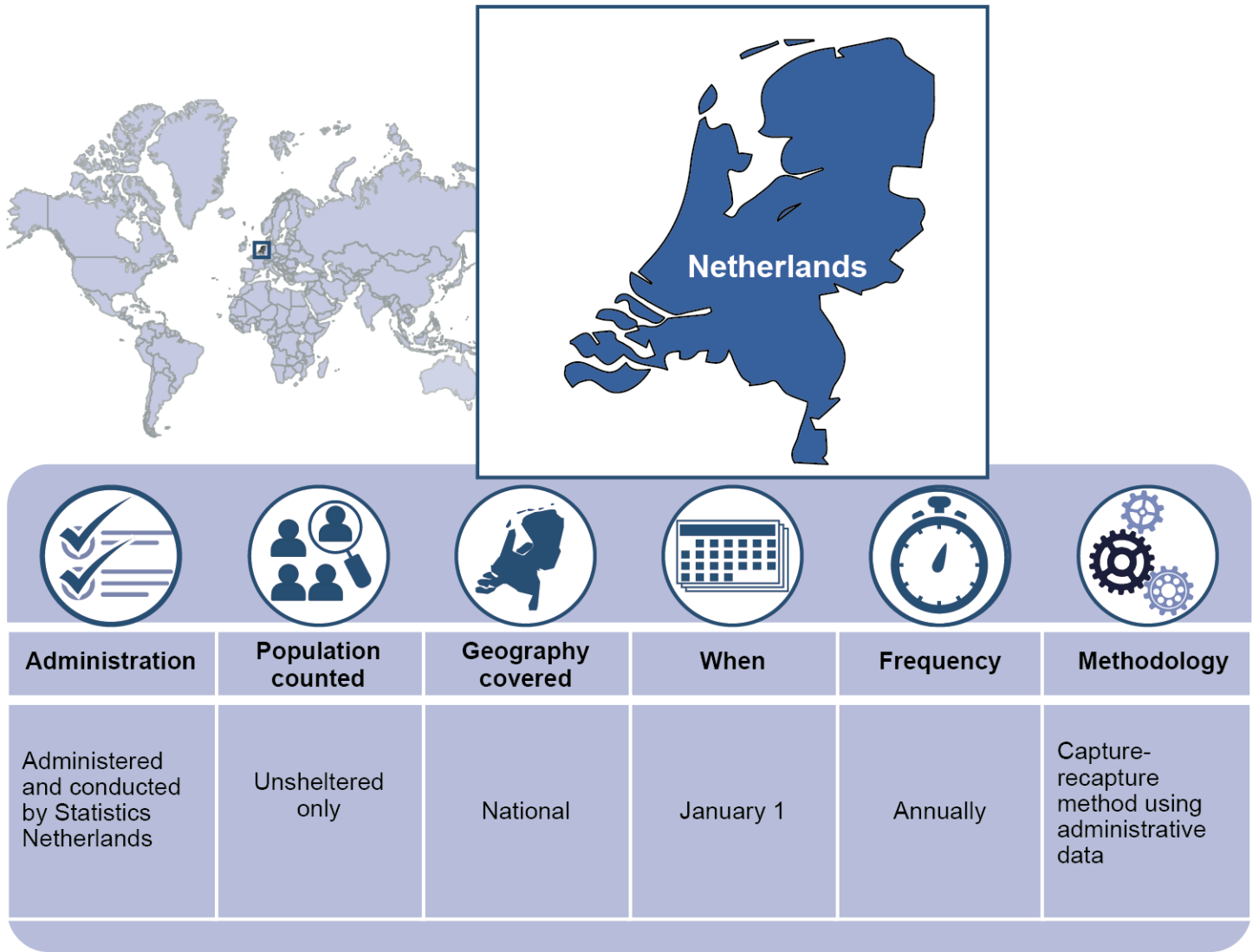
Using the capture-recapture method helps count people experiencing homelessness who may be absent from some administrative data sources, such as those who do not commonly use shelters.<sup>45</sup> Figure 5 summarizes selected attributes of the estimation technique used in the Netherlands.

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<sup>44</sup>Officials told us that Statistics Netherlands applied capture-recapture of three linked administrative data sets at a single reference date to generate an estimate of the total population experiencing homelessness. See also Statistics Netherlands, *Homelessness More than Doubled Since 2009*, <https://www.cbs.nl/en-gb/news/2019/34/homelessness-more-than-doubled-since-2009>.

<sup>45</sup>For example, researchers estimated that there were over 17,000 people experiencing unsheltered homelessness in the Netherlands on a single night in 2009. They based this estimate on the number of people included in administrative databases as experiencing homelessness (over 5,000) and those estimated as missing from all three administrative databases (over 12,000) using a modeling technique.

**Figure 5: Attributes of the Netherlands' Count of People Experiencing Homelessness**



Source: GAO; Map Resources. | GAO-22-104445

According to officials, strengths of the Netherlands' approach include cost-effectiveness—the Netherlands has high-quality administrative data sources readily available—and its ability to identify hidden or hard-to-reach-populations. Limitations include that the administrative data, and resulting estimate, do not include people under 18 or over 65. Officials also said their method requires maintaining a high level of data quality—

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for example, the ability to link the same individual among different databases. Respondents may refuse participation if they have concerns about privacy or confidentiality.

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## Australia

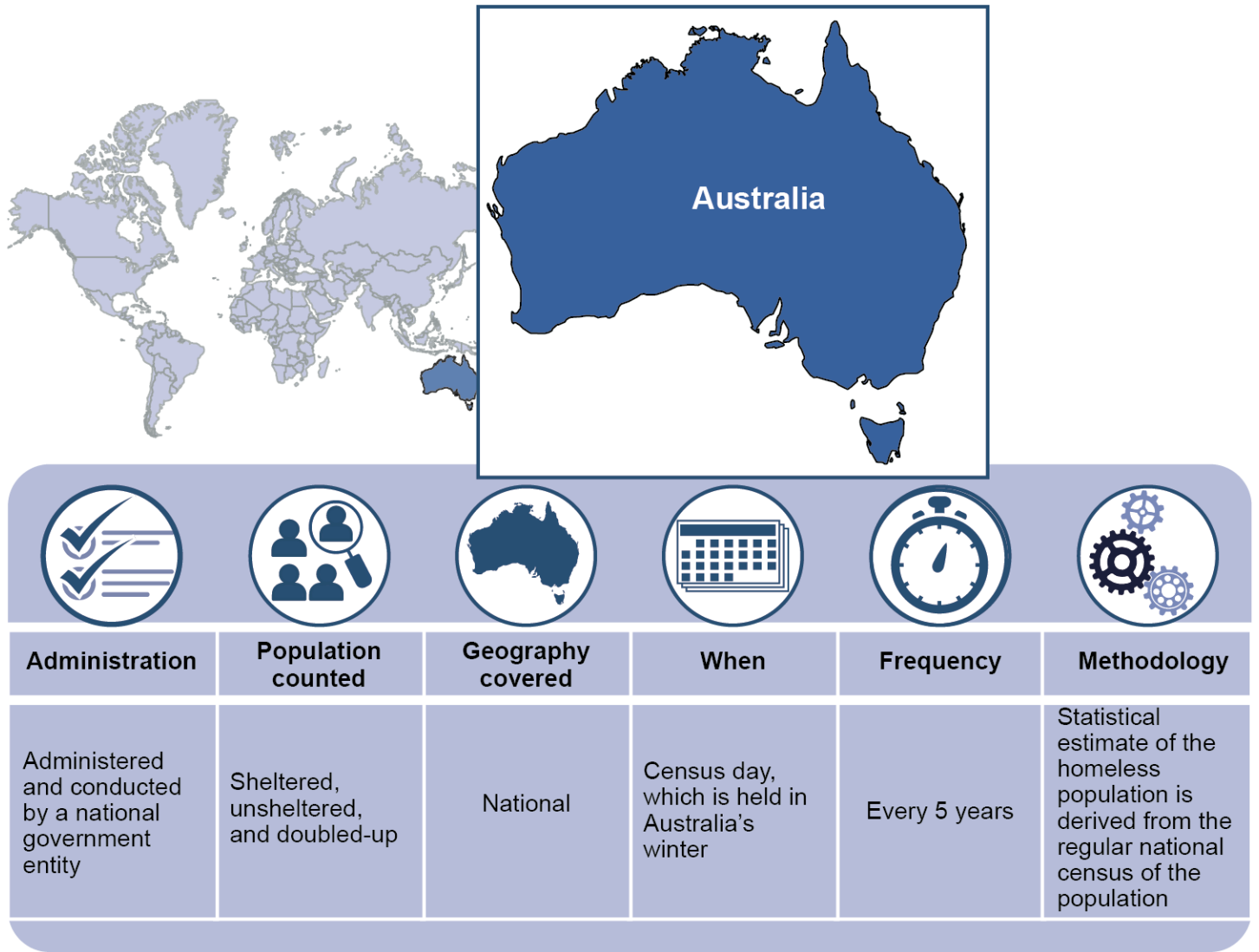
Australia's national census authority produces an estimate of the homeless population using data from the general census of the entire Australian population.<sup>46</sup> Estimates include situations counted as homeless in Australia, including people in unsheltered, sheltered, and doubled-up (living in households with more than one family). The national statistical agency develops an estimate using analytical techniques, based on both the characteristics observed in the census and assumptions about the way people may respond to census questions.<sup>47</sup> Figure 6 summarizes selected attributes of Australia's count.

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<sup>46</sup>For more information about Australia's count, see the Australian Bureau of Statistics at <https://www.abs.gov.au/>.

<sup>47</sup>Australian Bureau of Statistics, *Census of Population and Housing: Estimating Homelessness* (Australia: Mar. 14, 2018).

**Figure 6: Attributes of Australia’s Count of People Experiencing Homelessness**



Source: GAO; Map Resources. | GAO-22-104445

Strengths of Australia’s approach include consistently collecting and providing estimates since 2001, which allows comparison of trends over time, according to officials. This approach also allows for alternative measures of homelessness because certain subpopulations, such as people living in overcrowded dwellings, can be included or excluded.

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Limitations of this approach include that it is imprecise because variables collected for other purposes must be interpreted as proxies for likely homelessness. For example, people reported as having “no usual address” may include people not likely to have experienced homelessness. In these cases, proxies such as reported income, rent or mortgage payments, and employment status are used to exclude people traveling for personal or business reasons, or people who have recently moved to Australia, even though they had indicated “no usual address.”

In addition, because Australia conducts its census every 5 years, tracking progress against national annual goals can present challenges. Officials said their approach may also underestimate homelessness among some populations. For example, people displaced because of domestic violence may be undercounted if they are reluctant to participate in the census out of fear.

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## Most Communities Use HUD Funds, and the Most Common Costs Were for Incentives, Meals, and Technology

Very little is known about PIT count funding sources and resources expended because HUD does not collect detailed cost information from CoCs. According to HUD officials, CoCs are permitted to use HUD funds to conduct the PIT count and can supplement with other funds, as needed.<sup>48</sup> HUD officials also stated that CoCs do incur costs for conducting their unsheltered count, as well as costs for aggregating and cleaning HMIS data for the sheltered count. Because very little is known about PIT count costs, we surveyed a nongeneralizable sample of 60 CoCs and received responses from 41 of them about PIT count funding sources and costs.<sup>49</sup>

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## Selected CoCs Used HUD Funds to Conduct Unsheltered PIT Counts, and All Relied on Volunteers

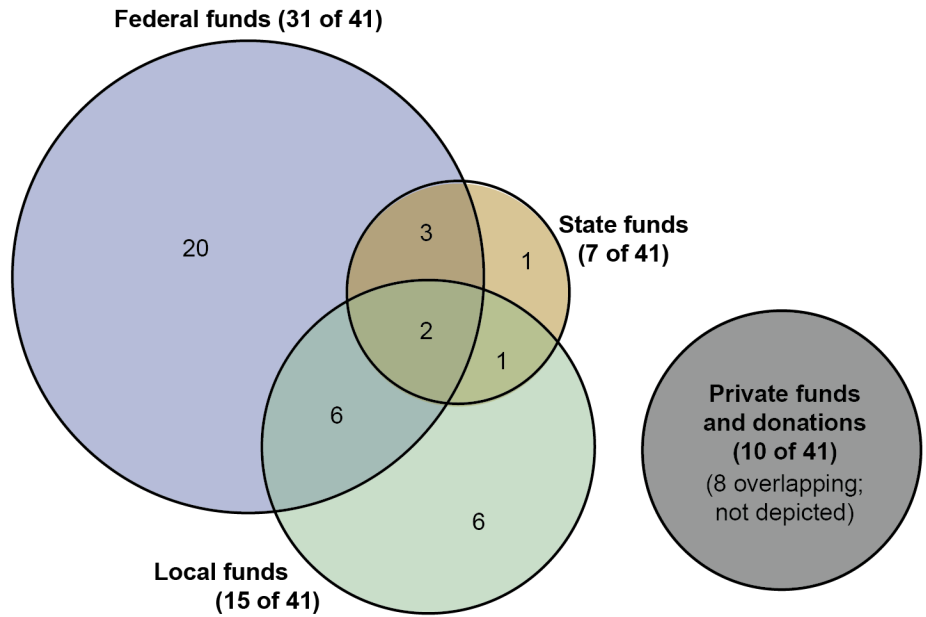
Most CoCs that responded to our cost questionnaire indicated they used HUD funds to complete their most recent unsheltered PIT count prior to the COVID-19 pandemic. Many CoCs also indicated they used multiple funding sources, including state and local funds, as well as private funds and donations (see fig. 7). In addition, all of these CoCs relied on volunteers to help complete their last unsheltered PIT counts prior to the pandemic.

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<sup>48</sup>CoCs' costs for conducting the PIT count are eligible under their planning grant funds, and there are statutory limits on the amount of planning funds that CoCs can apply for based on a percentage of each CoC's total grant funding.

<sup>49</sup>As of October 2021, we received 41 completed questionnaire responses from a total of 60 sampled CoCs. These included 14 rural, 13 major city, 10 suburban, and four urban CoCs. The results from our sample are not representative of all the CoCs in the United States.

**Figure 7: Funding Sources for the Unsheltered Point-in-Time Count Reported by 41 Selected Continuums of Care (CoC) for Their Most Recent Unsheltered Count Prior to 2021**



Source: GAO analysis of CoC questionnaire responses. | GAO-22-104445

**Federal funding.** A majority of CoC questionnaire respondents—31 out of 41 CoCs, or 76 percent—reported they used some form of federal funds to help them complete their most recent unsheltered PIT count prior to 2021, either alone or in combination with other funding sources.<sup>50</sup> All 31 CoC respondents that indicated use of federal funding reported using HUD CoC grant funding specifically. Seventeen CoC respondents indicated the HUD CoC grant was their sole source of funding used to execute their last unsheltered PIT count. Additionally, five CoCs used

<sup>50</sup>As previously noted, many CoCs did not conduct a 2021 in person unsheltered PIT count due to challenges resulting from the COVID-19 pandemic. Thus, we asked CoCs about costs associated with their most recent PIT count prior to 2021 (either 2019 or 2020).



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Emergency Solutions Grants and one used Community Development Block Grants.<sup>51</sup>

**State and local funding.** Nineteen of the 41 CoC respondents indicated that they used some form of either state or local funding to execute their unsheltered PIT counts. Additionally, seven out of 41 CoC questionnaire respondents indicated that they used some form of state funding—either alone or in combination with federal and local funding—to help them complete their unsheltered PIT count. Respondents indicated they received funding in the form of state appropriations and grants. For example, one CoC reported receiving a 25 percent match from its state, while another CoC respondent noted that its state government paid for all its PIT count printing, distribution, and incentive costs.

Fifteen CoC questionnaire respondents reported using funding from local, county, or city sources to complete their unsheltered PIT count—either alone or in combination with federal or state funds. Some of these local funding sources included municipal appropriations and grants from city and county governments, local housing authorities, nonprofits, and businesses. One CoC respondent, for example, stated that counties across its service area contributed small lottery- or discretionary-funded grants, which allowed the CoC to purchase incentives to encourage participation during its PIT count. Finally, two respondents indicated they used funds from all three sources—local, state, and federal.

**Private funds and donations.** Ten of 41 respondents reported using donations from businesses, local organizations, churches, and fundraising events to help conduct their unsheltered PIT count, with two CoCs relying solely on donations. Some of these respondents stated they received cash and in-kind donations (nonmonetary contributions of goods or services). In-kind donations included items used to encourage people experiencing homelessness to speak with volunteers, such as warm clothing and personal hygiene and other supplies. Two CoCs noted that

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<sup>51</sup>HUD's Emergency Solutions Grants program can provide funding for a community's street outreach, emergency shelters, HMIS, homelessness prevention, and rapid rehousing assistance programs. Activities undertaken with Community Development Block Grant program funds, with the exception of funds allowed for administrative and planning activities, must (1) benefit low- and moderate-income persons, (2) aid in the prevention or elimination of slums or blight, or (3) meet urgent community development needs.

they received donated space as well as vouchers, tokens, or vehicles used to transport their volunteers.

**Volunteer hours.** All CoC questionnaire respondents reported their CoC used volunteers to help complete its last unsheltered PIT count.<sup>52</sup> However, the number of volunteer hours varied widely.<sup>53</sup> For example, CoC respondents that serve areas with less unsheltered homelessness generally reported using fewer volunteer hours. Three of 41 CoC respondents reported that, beyond typical staff costs associated with the PIT count, their communities use only volunteers and do not have other costs associated with their PIT counts. CoC respondents classified as major cities had the highest median volunteer hours used to execute their PIT counts among types of CoCs (see table 2).

**Table 2: Reported Volunteer Hours for Most Recent Unsheltered Point-in-Time Count for Selected Continuums of Care (CoC), by CoC Type**

CoC type	Median reported volunteer hours	Range of reported volunteer hours	Number of CoC respondents
Major city	1,140	35 to 67,000	11
Rural	133	20 to 4,700	7
Suburban	180	11 to 3,000	8
Urban	150	24 to 440	4
All CoC respondents <sup>a</sup>	223	11 to 67,000	30 <sup>b</sup>

Source: GAO analysis of CoC questionnaire responses. | GAO-22-104445

<sup>a</sup>The results from our sample are not generalizable to all CoCs in the United States.

<sup>b</sup>Eleven CoCs that responded to our questionnaire could not provide us with volunteer hour data.

**Staff hours.** A majority of our questionnaire respondents indicated they use their own paid staff to conduct their unsheltered PIT counts. Thirty CoC respondents reported using a wide range of staff hours to complete their last unsheltered PIT count.<sup>54</sup> Similar to volunteer hours used, major

<sup>52</sup>While all 41 CoCs reported use of volunteers, 11 CoCs were unable to provide us with specific volunteer hour data.

<sup>53</sup>The majority of respondents estimated volunteer hours by multiplying their total number of volunteers by their recorded time commitments.

<sup>54</sup>The majority of our questionnaire respondents provided these estimates based on staff hour data taken from CoC staff timesheets or personnel systems.

city CoC respondents had the highest median staff hours to execute their PIT counts compared with any other type of CoC (see table 3).

**Table 3: Reported Staff Hours for Most Recent Unsheltered Point-in-Time Count for Selected Continuums of Care (CoC), by CoC Type**

CoC type	Median reported staff hours	Range of reported staff hours	Number of respondents
Major city	568	500 to 1,250	8
Rural	60	5 to 800	9
Suburban	160	40 to 1600	10
Urban	65	40 to 108	3
All CoC respondents <sup>a</sup>	166	5 to 1600	30 <sup>b</sup>

Source: GAO analysis of CoC questionnaire responses. | GAO-22-104445

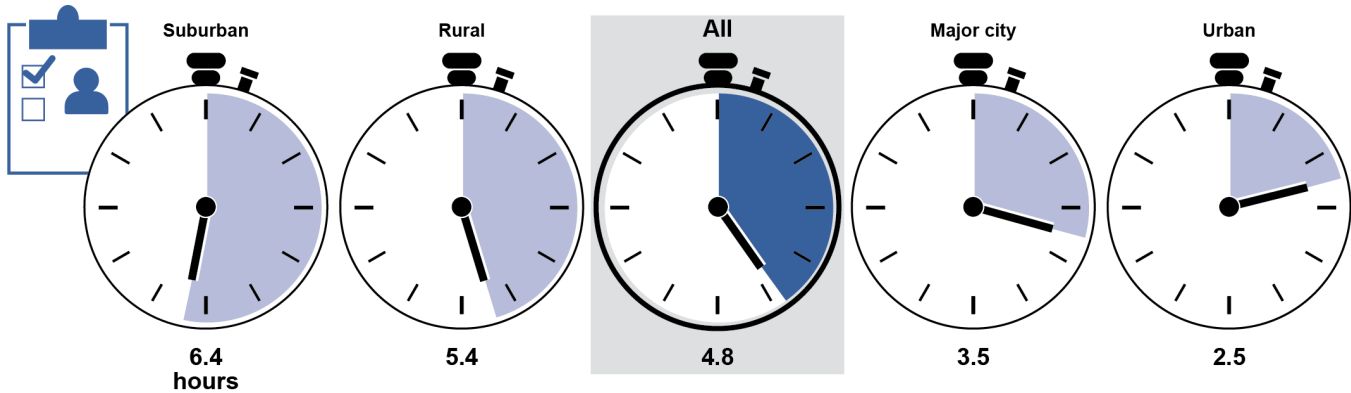
<sup>a</sup>The results from our sample are not generalizable to all CoCs in the United States.

<sup>b</sup>Ten CoCs that responded to our questionnaire could not provide staff hour data.

Six of the major city CoC respondents also reported leveraging resources from other municipal departments, such as staff time and physical resources like vehicles and office equipment, to complete their unsheltered PIT counts.

**Work hours.** The total work hours (combined staff and volunteer) CoCs used to complete their unsheltered PIT counts averaged 4.8 hours for every person counted in 2020, but varied by CoC type (see fig. 8). One suburban and three rural CoC respondents told us their large geographic areas and difficulty locating individuals experiencing homelessness contributed to the higher number of work hours they needed to complete their unsheltered PIT count.

**Figure 8: Reported Work Hours per Homeless Person Counted for Selected Continuums of Care (CoC), by CoC Type**



Source: GAO analysis of CoC questionnaire responses. | GAO-22-104445

Note: GAO analysis of CoC work hours is based on questionnaire responses and is not generalizable to all CoCs in the United States.

**Costs for unsheltered PIT count.** Twenty-five of the 41 CoCs reported some explicit costs associated with conducting their last unsheltered PIT count, and all 25 CoCs indicated that these costs were typical expenses for the unsheltered PIT count in a given year.<sup>55</sup> Within different types of costs CoCs reported, the amounts varied widely and were generally higher among major city CoCs.

The most common explicit CoC cost was incentives for enumerators or respondents. Fifteen CoCs reported spending from \$500 to \$79,000 on incentives for CoC staff, PIT count volunteers, and respondents. The wide range of incentive costs may be due in part to the number of volunteer hours different CoCs used.

The second most common cost was for meals. Of the 25 CoCs that reported costs, 12 reported costs for meals, ranging from \$70 to \$4,375. CoC volunteer meal costs varied among our respondents. This may be due in part to the different numbers of volunteer hours each CoC used to execute its PIT count—for example, the CoC at the high end of the range used 6,500 volunteers totaling over 60,000 volunteer hours to complete its last unsheltered PIT count.

The third most common cost reported was CoC contractor or consultant fees related to technology, cited by 10 CoCs that reported costs. These

<sup>55</sup>Fifteen CoC respondents did not provide us with specific PIT count cost data because they did not know the details, while one CoC reported it had no explicit PIT count costs.

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10 CoCs reported spending between \$500 and \$265,000 on contractor technology services, with a median of \$12,160. Three CoC respondents that reported lower technology costs had expenses related to software and program licenses. Three CoC respondents that reported higher technology costs attributed these expenses to consultant fees and the development of custom counting applications used on mobile devices.

**Costs for sheltered PIT count.** All 41 CoC respondents provided us with information on the most costly elements of their sheltered PIT counts:

- Twenty-nine respondents stated that data entry, cleaning, and analysis were the most costly elements.
- Ten respondents indicated that administrative and planning costs were the most costly elements.
- Two respondents stated that execution of the sheltered PIT count—collecting data from people experiencing homelessness—was their most costly element.

In addition, 40 out of 41 questionnaire respondents stated that, prior to the COVID-19 pandemic, the cost to perform their sheltered PIT count was either the same as or lower than the cost to perform their unsheltered PIT count, while one CoC indicated its sheltered PIT count costs were higher.

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### Most CoCs Reported That the Costs of Their 2021 PIT Counts Were the Same as or Less Than Their Prepandemic PIT Count Costs

As previously noted, fewer CoCs conducted unsheltered PIT counts in 2021 than in 2020 because of the COVID-19 pandemic. Twenty-three questionnaire respondents performed an unsheltered PIT count in 2021—of these, nine indicated that the costs were the same, while another nine noted that their costs were lower. Four CoCs noted higher 2021 costs than before the pandemic, and one CoC did not know how its costs had changed due to the pandemic.

The nine respondents that indicated lower costs in 2021 cited various reasons. Six respondents said they used fewer volunteers or scaled back their PIT count efforts, in part because of federal and local COVID-19 health guidance, and thus had lower costs for volunteer meals, transportation, or incentives. For example, instead of using volunteers to conduct an in-person street count, one CoC said it submitted HMIS data to HUD in 2021. One CoC that reported lower 2021 PIT count costs stated that in order to follow federal and local COVID-19 health guidance, it utilized far fewer volunteers in 2021. Another CoC explained that it scaled its enumeration efforts back by one-third compared to its

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prepandemic efforts. Two CoCs indicated that their lower costs were due to a change in methodology because of the pandemic. One CoC noted that it lowered its costs by switching from an in-person PIT count to service-based sampling. Representatives from this CoC said that although this change was made in response to the pandemic, they felt this approach achieved a more comprehensive count because the homeless service providers administering the surveys were already known and trusted by their clients.

Of the four respondents reporting higher 2021 PIT count costs than in previous years, three CoCs cited higher-than-usual expenses related to street-counting applications or technology designed to improve enumeration accuracy. The fourth CoC cited costs for personal protective equipment, such as masks, gloves, or hand sanitizer.

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## Conclusions

The pandemic disrupted the 2021 PIT count and prompted HUD to allow CoCs to use new methods to count people experiencing unsheltered homelessness, which may be considered options for future PIT counts. For the unsheltered count, HUD allows CoCs to use administrative data to supplement in-person enumeration, an approach that likely improves the accuracy and completeness for some CoCs. However, HUD has provided CoCs with limited information on how best to use HMIS and other administrative data as part of their unsheltered PIT count estimates. By providing CoCs with tools and information on using HMIS data for their unsheltered PIT counts, HUD could help improve the quality of CoCs' estimates, enhance data comparability across CoCs, and better position CoCs in the event that, as with the COVID-19 pandemic, future in-person counts are disrupted.

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## Recommendation for Executive Action

HUD's Deputy Assistant Secretary for Special Needs should provide additional tools and information about how CoCs can use Homeless Management Information System and other administrative data to help improve the accuracy of their unsheltered Point-in-Time count. (Recommendation 1)

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## Agency Comments

We provided a draft of this report to HUD and the U.S. Interagency Council on Homelessness for review and comment. In its comments, reproduced in appendix II, HUD agreed with our recommendation. HUD also provided technical comments, which we incorporated as appropriate. Comments provided by the U.S. Interagency Council on Homelessness have been reproduced in appendix III.

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In its written comments, HUD noted that administrative data have the potential to improve the unsheltered PIT count estimates but stated they are not an adequate substitute for conducting a count in most communities. HUD agreed with the recommendation that it should provide additional support to CoCs on how to use administrative data to improve the accuracy of their counts but stated that HUD does not generally believe that CoCs should solely use administrative data to conduct their unsheltered counts. We did not intend to imply that CoCs should be permitted to solely use administrative data to conduct unsheltered PIT counts. As stated in our report, additional tools and information could be beneficial to CoCs to help improve the accuracy of PIT counts, in particular if CoCs experience disruptions with the count in the future, as they did during the COVID-19 pandemic.

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We are sending copies of this report to the Secretary of Housing and Urban Development, the Interim Executive Director of the U.S. Interagency Council on Homelessness, and other interested parties. In addition, this report will be available at no charge on GAO's website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-8678 or [cackleya@gao.gov](mailto:cackleya@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



Sincerely yours,  
Alicia Puente Cackley  
Director, Financial Markets and Community Investment

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# Appendix I: Objectives, Scope, and Methodology

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The objectives of this report were to (1) examine communities' approaches for counting people experiencing homelessness and the Department of Housing and Urban Development's (HUD) guidance for using these approaches, (2) describe the approaches selected foreign countries use to estimate their homeless populations, and (3) describe what is known about the funding sources and resources expended by selected communities in conducting the Point-in-Time (PIT) count.

To address all three objectives, we reviewed relevant laws and regulations, such as the McKinney-Vento Homeless Assistance Act and the Continuum of Care (CoC) Program regulations.<sup>1</sup> We also reviewed relevant reports from HUD, such as the Annual Homeless Assessment Reports to Congress from 2019 and 2020; CoC grant data for 2016–2021; and PIT count data compiled by HUD.

In addition, we interviewed HUD officials from the Office of Special Needs Assistance Programs, which oversees the administration of the CoC program, and other officials with a role in administration of HUD's CoC program. We also interviewed officials and reviewed relevant documentation from the Census Bureau, the U.S. Interagency Council on Homelessness, and the Department of Education to understand ways other federal agencies include people experiencing homelessness in counts and track the costs to conduct these counts. Additionally, we interviewed homelessness researchers from the Urban Institute, the Institute of Global Homelessness, and FEANTSA.<sup>2</sup>

To examine approaches for estimating the number of people experiencing homelessness, we conducted a search of academic and government literature describing approaches to estimating homeless populations. From these sources, we identified 26 studies that were relevant to our research objectives. We also reviewed relevant HUD documents, such as HUD's *Point-in-Time Count Methodology Guide*, to identify HUD standards and approved approaches for CoCs to use to estimate the

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<sup>1</sup>The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act to establish the Continuum of Care Program. Pub. L. No. 111-22, div. B., §§ 1301 – 1306, 123 Stat. 1632, 1663 (codified at 42 U.S.C. §§ 11381 – 11389). HUD's implementing regulations are at 24 C.F.R. Part 578.

<sup>2</sup>FEANTSA is the European Federation of National Organisations Working with the Homeless, a European nongovernmental organization of nonprofit services that support people experiencing homelessness in Europe.



number of individuals experiencing homelessness in their communities on the night of the PIT count.<sup>3</sup>

Additionally, we reviewed data compiled by HUD on the approaches that CoCs used to conduct the 2019 and 2020 unsheltered PIT counts and data quality standards. For our July 2020 report on HUD's PIT count, we assessed the quality of these data by reviewing related documentation and interviewing HUD officials. We reported the 2019 PIT count data in this report since they were the most recently available complete data because unsheltered PIT counts are conducted in odd-numbered years making the 2020 PIT count data less complete and the 2021 PIT count was disrupted by the pandemic. We determined that these HUD data were sufficiently reliable for our purposes of identifying which approaches CoCs used for the 2019 PIT count.

We also reviewed HUD's guidance for the fiscal year 2021 unsheltered PIT count during the Coronavirus Disease 2019 pandemic. We also interviewed HUD officials to better understand HUD standards and interviewed five CoCs that were approved to use administrative data in lieu of in-person counting for the 2021 PIT count about their respective approaches to estimating the homeless population in their communities. Additionally, we spoke with two CoCs that did not use administrative data to conduct their 2021 unsheltered PIT count.

Additionally, we assessed HUD guidance on conducting the PIT count against HUD and federal internal control standards.<sup>4</sup> We determined that the information and communication component of internal control was significant to this objective, along with the underlying principle that management should externally communicate the necessary quality information to achieve the agency's objectives.<sup>5</sup> We also assessed HUD's guidance on the use of administrative data against the standards HUD describes in its *Point-in-Time Methodology Guide*. We spoke with CoCs about their use of existing data and the usefulness of HUD's guidance for

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<sup>3</sup>Department of Housing and Urban Development, *Point-in-Time Count Methodology Guide* (Washington, D.C.: September 2014).

<sup>4</sup>Department of Housing and Urban Development, Office of Community Planning and Development, *Availability of Waivers for the Biennial Point-in-Time Count of Unsheltered Homelessness* (Washington, D.C.: January 2021), Department of Housing and Urban Development, *Point-in-Time Count Methodology Guide* and GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

<sup>5</sup>[GAO-14-704G](#).

the purposes of estimating the number of individuals experiencing homelessness.

To describe how selected countries estimate their homeless populations and the strengths and limitations of their approaches, we selected four countries to review as case studies. To select the countries, we considered our literature results, recommendations, homeless count frequency, overall population size, and geography. We first identified countries that had approaches described in the academic literature we found through our literature search. We also asked officials from the U.S. Interagency Council on Homelessness, HUD, the Census Bureau, and the Department of Education and homelessness researchers and advocacy groups for recommendations of foreign countries to include in our review. We excluded countries that do not conduct counts regularly, which we defined as a frequency of every 5 years or more.

To achieve some comparability with the United States, we selected the four countries from this list with the largest populations: Canada, England, the Netherlands, and Australia. For each country, we interviewed government officials and researchers or received written responses to a detailed set of standard questions about the approaches used to estimate homeless populations. Additionally, we reviewed official websites, published papers or reports, and relevant documentation from each selected country on its policies and procedures for estimating its homeless populations. Finally, foreign government officials from each country reviewed their relevant sections for accuracy before the report was finalized.

To describe what is known about the funding sources and costs associated with conducting the national PIT count, we developed a brief questionnaire that asked CoCs about their costs and staff or volunteer hours related to their PIT count. We sent the questionnaire to a nongeneralizable sample of 60 CoCs and received responses from 41 of them (68 percent). To select the 60 CoCs, we sought to achieve diversity in size and geography. We selected the 10 CoCs with the largest reported homeless populations and randomly selected an additional 50 CoCs distributed across HUD's 10 geographic regions and CoC types (major city, urban, suburban, and rural).

To develop the questions, we interviewed CoC representatives to ensure the questions were relevant and reasonable and that respondents could provide reliable and valid responses. Additionally, we conducted three pretests of our questionnaire with CoCs in a variety of locations (one

major city, one suburban, and one rural) and incorporated their feedback. Our methodologist also reviewed the questionnaire and provided feedback.

To understand any trends from the completed questionnaires we received, we analyzed CoC responses and calculated descriptive statistics. To calculate work hours per homeless person counted, we analyzed data on volunteer and staff hours received from 26 total CoC respondents and compared those figures with each CoC's number of unsheltered homeless individuals reported during their most recent unsheltered PIT count. We conducted follow-up interviews with a selection of CoCs to obtain clarification on their responses or additional information about alternative approaches used during the 2021 PIT count. The information we reported from these questionnaires is not generalizable to all CoCs.

We conducted this performance audit from July 2020 to November 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix II: Comments from the Department of Housing and Urban Development



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000

PRINCIPAL DEPUTY ASSISTANT SECRETARY  
FOR COMMUNITY PLANNING AND DEVELOPMENT

Mrs. Alicia Puente Cackley  
Director  
Financial Markets and Community Investment  
U.S. Government and Accountability Office  
441 G. Street, NW  
Washington, DC 20548-0001

Dear Mrs. Cackley:

Thank you for the opportunity to review and comment on the Government and Accountability Office's (GAO) draft report titled, "HUD Should Help Communities Better Leverage Data to Estimate Homelessness" (GAO-20-104445). The Department of Housing and Urban Development (HUD) appreciates GAO's review of HUD's Point-in-Time (PIT) count process as well as other considerations, including other counting approaches and the cost of counting.

Counting people experiencing homelessness is a critical component of HUD's effort to better understand how many people are experiencing homelessness and their characteristics. This data becomes the backbone for Federal, state, and local partners to understand the needs of our homeless population and how it has changed over time.

### **Community Approaches to Counting People Experiencing Homelessness and HUD's Guidance to Support Counting Efforts**

This report highlights that HUD has provided a set of counting standards for communities to follow and communities have adapted those standards to their local circumstances and their unique geographic areas. As documented in the previous GAO report ([GAO-20-433](#)), HUD can provide more guidance to support Continuums of Care (CoC) in their local implementation.

This report emphasizes the potential to use administrative data to support the unsheltered PIT count. The Homeless Management Information System (HMIS) data has been a primary source for sheltered PIT count data but minimally used for unsheltered PIT counts. While HUD agrees that this data has the potential to improve the unsheltered PIT count estimates, HUD does not believe that HMIS or other administrative data is an adequate substitute for conducting a PIT count in most communities. This is because the data on people experiencing unsheltered homelessness is based on people who seek out or accept service interactions with the larger homeless response system. It creates a systemic bias against people who are not comfortable engaging the service system. The Department's unsheltered PIT count methods require CoCs to go to people in unsheltered locations, as opposed to waiting for them to come to community partners.

[www.hud.gov](http://www.hud.gov)

[espanol.hud.gov](http://espanol.hud.gov)

However, administrative data can be a unique resource to validate unsheltered PIT count efforts, especially if the unsheltered PIT count involves interviews. CoCs could use their administrative data to compare with the unsheltered PIT count data and potentially add additional people to the count based on that comparison. Administrative data can also be helpful in understanding the characteristics of people experiencing unsheltered homelessness. It can be a challenge to collect the various HUD-required data elements and CoCs could use administrative data to fill in gaps on specific people interviewed. Administrative data can also be helpful as a comparison point for the characteristics of people experiencing unsheltered homelessness. CoCs can compare the data from the count to their unsheltered PIT count data to analyze whether there are biases in either data set that may implicate inequities in their data collection and their larger homeless service system. **While HUD does not generally believe that CoCs should solely use administrative data to conduct their unsheltered counts, HUD agrees with the recommendation that HUD can provide additional support to CoCs on how to use administrative data to improve the accuracy of their counts.**

#### **Homeless Count Approaches in Other Countries**

The analysis of how other countries conduct their homeless estimates is valuable. This report shows that the Department has a relatively strong approach with national coverage that is applied consistently and allows for longitudinal analysis. While the unsheltered PIT counts across the United States are not perfect, they are consistent enough over time to allow stakeholders in the effort to end homelessness to gain an understanding of how many people are homeless and about their characteristics.

#### **The Cost of Conducting PIT Counts**

This report provides unique insight into the cost of conducting PIT counts. While costs vary by community, it is clear that HUD funding is a critical resource and that volunteers are a crucial component to the PIT counts. CoCs are allowed to use their CoC Planning Grant to pay for the costs of conducting a PIT count. Unfortunately, the CoC Planning Grant is also the only HUD funding CoCs can use to pay for other critical CoC functions, like subrecipient monitoring, strategic planning, and coordination among housing and service partners. CoCs are using these funds along with many other resources from partners in their communities to conduct the best count they can.

This report also affirmed that volunteers are a consistent resource that make the counts possible. This reinforces the reality that the PIT count is not merely the job of the CoC, but it is part of a larger community effort to identify who is experiencing homelessness so we can then offer them appropriate housing and services. Volunteers donate their time to make the counts happen and they often contribute in other ways following the count to serve people experiencing homelessness. The PIT count is not merely about counting people – it is about bringing awareness to a vital human crisis and rallying as a community to find people and get them stable housing.

Thank you again for this careful analysis of the PIT count and providing both a deeper domestic view of the PIT count but also an international context to the PIT count efforts.

Sincerely,

**JAMES  
JEMISON**

Digitally signed by JAMES  
JEMISON  
Date: 2021.11.05 15:28:17  
-04'00'

James A. Jemison, II  
Principal Deputy Assistant Secretary  
Office of Community Planning and Development

# Appendix III: Comments from the U.S. Interagency Council on Homelessness



**Anthony Love**

Interim Executive Director  
U.S. Interagency Council on Homelessness  
301 7th Street SW, Room 2080  
Washington, DC, 20407

**Alicia Puente Cackley**

Director, Financial Markets and Community Investment  
U.S. Government Accountability Office  
441 G Street NW  
Washington, DC, 20548

*Wednesday, November 3, 2021*

Dear Director Cackley:

The United States Interagency Council on Homelessness (USICH) thanks you for the opportunity to review and comment on the Government Accountability Office's (GAO) draft report titled *Homelessness: HUD Should Help Communities Better Leverage Data to Estimate Homelessness* (GAO-22-104445).

In its report, GAO made the following recommendation:

"HUD's Deputy Assistant Secretary for Special Needs should provide additional tools and information about how CoCs can use Homeless Management Information System and other administrative data to help estimate their unsheltered Point-in-Time count. (Recommendation 1)"

USICH concurs with this recommendation for HUD to provide more guidance on utilizing administrative data. USICH wants to encourage increased incentivization and guidance from HUD to build the Homeless Management Information System (HMIS) to include broader participation beyond HUD-funded programs in order to capture all households experiencing homelessness regardless of entry point into the homelessness system (e.g., food banks, drop-in centers, missions, health clinics serving high numbers of people experiencing homeless). Communities like Houston, Texas; and the state of Washington are examples of having HMIS data incorporate other entry points. For Houston, their HMIS includes data from food banks and feeding programs; and for Washington state, their HMIS works with all state system data (e.g., child welfare, Medicaid, education system, the criminal justice system).

Again, thank you for the opportunity to review and respond to the draft report.

Sincerely,

A handwritten signature in black ink that reads "Anthony Love".

Anthony Love  
Interim Executive Director  
U.S. Interagency Council on Homelessness

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

Alicia Puente Cackley, (202) 512-8678 or [cackleya@gao.gov](mailto:cackleya@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Beth Faraguna (Assistant Director), Jordan Anderson (Analyst in Charge), Anna Blasco, Tarik Carter, Lilia Chaidez, John McGrail, Marc Molino, Jennifer Schwartz, Farrah Stone, and Sirin Yaemsiri made key contributions to this report.



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