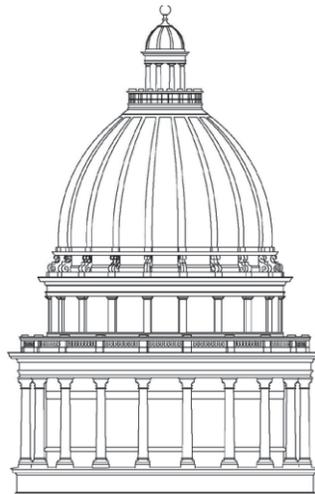


REPORT TO THE  
**UTAH LEGISLATURE**

Number 2021-07



**A Follow-up Audit of the Safety and Security  
Within Local Homeless Resource Centers**

May 2021

Office of the  
LEGISLATIVE AUDITOR GENERAL  
State of Utah





STATE OF UTAH

# Office of the Legislative Auditor General

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KADE R. MINCHEY, CIA, CFE  
AUDITOR GENERAL

May 17, 2021

TO: THE UTAH STATE LEGISLATURE

Transmitted herewith is our report, **A Follow-up Audit of the Safety and Security within Local Homeless Resource Centers** (Report #2021-07). An audit summary is found at the front of the report. The objectives and scope of the audit are explained in the Introduction.

We will be happy to meet with appropriate legislative committees, individual legislators, and other state officials to discuss any item contained in the report in order to facilitate the implementation of the recommendations.

Sincerely,

A handwritten signature in black ink that reads "Kade minchey".

Kade R. Minchey, CIA, CFE  
Auditor General





## PERFORMANCE AUDIT

# Safety and Security Within Local Homeless Resource Centers

### ▶ AUDIT REQUEST

We were asked to do an in-depth follow-up of a 2018 audit which raised concerns about the safety and security at three facilities operated by The Road Home, a non-profit provider of homeless services.

### ▶ BACKGROUND

In 2019, three homeless resource centers (HRCs) opened in Salt Lake County in late 2019. The family shelter in Midvale has also transitioned into an HRC. The Road home operates three of these HRCs including:

- Midvale Family Resource Center: 300-bed facility for families
- South Salt Lake Men's Resource Center: 300-bed facility for men
- Gail Miller Resource Center: 200-bed facility for men and women

The fourth HRC, operated by Volunteers of America, is the Geraldine E. King Women's Resources Center, which is a 200-bed facility for women.

HRCs provide a broad set of resources that were not available in the former downtown shelter.



## KEY FINDINGS

- ✓ The Road Home and Shelter the Homeless have addressed on key concern by adopting a new set of safety and security policies.
- ✓ New security and design features have improved the safety and security at the Homeless Resource Centers (HRCs).
- ✓ With reports of contraband and criminal activity in the HRCs, opportunities exist to further reduce criminal activity.
- ✓ HRCs serve a challenging population who require a broad array of treatment options to help overcome barriers to housing.



## RECOMMENDATIONS

- ✓ Shelter the Homeless should consider deploying K9 units at HRCs and review current staffing level
- ✓ Shelter the Homeless should provide HRC operators with clear guidance for responding to violations of HRC policies.
- ✓ HRCs should continue to work with public and nonprofit partners to apply the best practices for safety and security.
- ✓ HRCs should improve the manner of information sharing with local law enforcement and continue to improve coordination meetings.



## REPORT SUMMARY

### *Safety and Security Have Improved at the New Homeless Resource Centers*

In the three years since our May 2018 audit, safety and security has improved at facilities serving those experiencing homelessness in Salt Lake County. The Road Home and Shelter the Homeless adopted new safety protocols which they have applied at their three new HRCs. Additionally, the design of the HRCs includes safety features that were lacking at the former downtown shelter.



Photo Source: Gail Miller Resource Center Security Footage Video

An improved screening process at the entry way has reduced flow of drugs into the HRCs.

### *Opportunities Exist for Resource Centers To Further Reduce Criminal Activity*

Although conditions have improved, drug use and other criminal activity continue to be a problem. This conclusion is based on our review of drug cases described in incident reports prepared by staff, our own observations of drug use in the facilities, and statements by guests who have observed drug use in the facilities.



The audit team found evidence of drug use at the HRCs.

### *Resource Centers Require Support from Law Enforcement and Other Community Partners*

To understand why it is so difficult to prevent drug use, assault, and theft within a homeless shelter, it is important to recognize that homeless resource centers serve a challenging, high risk population. We found that more than half of the residents in the men's shelter have a history of substance abuse, mental illness, or both.

Until the additional housing is made available, along with substance abuse and mental illness treatment options, the resource centers operators will need the support from law enforcement, human services providers, and other stakeholders to manage the high-risk population currently residing in their facilities.



Photo Source: Deseret News

Law enforcement agencies can support HRCs by providing a consistent and positive interaction with people experiencing homelessness.

# REPORT TO THE UTAH LEGISLATURE

Report No. 2021-07

## **A Follow-up Audit of the Safety and Security Within Local Homeless Resource Centers**

May 2021

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# Table of Contents

## Chapter I

**Introduction..... 1**

Four Homeless Resource Centers Are Now in Operation in Salt Lake County ..... 1

Conditions in Homeless Resource Centers Have Improved..... 2

Follow-Up Audit on Homeless Service Oversight and  
Accountability Will Be Released Later in 2021..... 3

Audit Scope and Objectives ..... 3

## Chapter II

**Safety and Security Have Improved at Homeless Resource Centers..... 5**

New Policies Have Contributed to Safer,  
More Secure Homeless Resource Centers ..... 5

New Resource Centers Include Many New Security Features ..... 11

Cities Have Taken Steps to Improve Security  
Standards of New Resource Centers ..... 14

## Chapter III

**Opportunities Exist for Resource Centers To Further Reduce Criminal Activity.... 17**

Resource Center Residents Continue to  
Struggle with Drug Use and Other Crimes ..... 17

Resource Centers Can Continue to Improve  
Their Response to Drug Use and Crime ..... 21

Recommendations..... 27

## Chapter IV

**Resource Centers Require Support from Public and Nonprofit Partners..... 29**

The Resource Centers Serve A Challenging Population ..... 29

Continue to Apply Best Practices For Safety and Security..... 33

Recommendations..... 38

<b>Appendices .....</b>	<b>41</b>
Appendix A Shelter the Homeless Safety and Security Policy.....	43
Appendix B Excerpt from South Salt Lake City Conditional Use Permit Select Provisions Addressing Safety and Security.....	51
Appendix C Shelter the Homeless Security Operations Plan Submitted to Salt Lake City .....	59
Appendix D Shelter the Homeless Expectation Protocols .....	69
Appendix E Law Enforcement Best Practices .....	73
<b>Agency Responses .....</b>	<b>83</b>
Office of Homeless Services .....	85
Shelter the Homeless Volunteers of America The Road Home.....	89

# Chapter I

## Introduction

In a May 2018 audit report,<sup>1</sup> the Office of the Legislative Auditor General raised concerns about safety and security at two homeless shelters in Salt Lake County and at one housing facility for chronically homeless individuals. Each of the facilities was operated by The Road Home, a nonprofit organization that serves the homeless. The audit report described widespread drug use within the facilities, theft of personal belongings, and residents with weapons. Although The Road Home had procedures to prevent drugs and other contraband from entering the facilities, the procedures were poorly implemented. We recommended that The Road Home management take steps to improve security and that its board of directors provide more effective oversight.

During the three years since the audit report was released, the downtown shelter has been closed and replaced by three new homeless resource centers. The operators of the new facilities have worked with local law enforcement to develop protocols that promote improved safety and security. A follow-up audit was requested by the Legislature to identify the extent to which these efforts have succeeded. This follow-up report shows significant improvement in security and safety at facilities for Utah's homeless population; however, important improvements are still needed.

### **Four Homeless Resource Centers Are Now in Operation in Salt Lake County**

Three homeless resource centers (HRCs) opened in Salt Lake County in late 2019. The family shelter in Midvale has also transitioned into an HRC. The Road Home operates three of these HRCs including:

- Midvale Family Resource Center: 300-bed facility for families

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<sup>1</sup> A Limited Review of Three Facilities Operated by The Road Home ([ILR 2018-A](#))

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**Our 2018 audit raised concerns about the safety and security at two homeless facilities operated by The Road Home.**

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**Legislators asked for a follow-up audit to see if conditions at the new resource centers had improved.**

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**The old downtown homeless shelter has been replaced by three new homeless resource centers.**

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- South Salt Lake Men’s Resource Center: 300-bed facility for men
- Gail Miller Resource Center: 200-bed facility for men and women

The fourth HRC, operated by Volunteers of America, is the Geraldine E. King Women’s Resources Center, which is a 200-bed facility for women.

HRCs provide a broad set of resources that were not available in the former downtown shelter, such as:

- Three meals a day served in the shelter
- Expanded access to case management
- Storage capabilities for belongings
- Facilities for animals
- Outdoor common areas
- Shuttle services

In addition, HRC’s include office space for organizations that serve the homeless population. For example, organizations such as Utah Community Action, which provides shelter diversion services, and the 4<sup>th</sup> Street Clinic, which provides medical care, have space at each HRC location.

## **Conditions in Homeless Resource Centers Have Improved**

In the 2018 audit, we reported the following weaknesses in the safety and security operations at three of the facilities operated by The Road Home:

- Lax security screening of guests entering the facilities
- Lax enforcement of the code of conduct for guests staying in facilities
- Weapons, drug paraphernalia, and controlled substances in the facilities
- Unsecured doors and entryways
- Broken security cameras

To address these serious concerns, we recommended that The Road Home and Shelter the Homeless develop and enforce written

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**The homeless resource centers provide guests with many services that were not available at the old downtown shelter.**

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standards and policies for the facilities they operate. These policies included standards of conduct for those residing in the facilities, protocols for enforcing those standards, an improved intake process, and policies regarding how to respond to the use and distribution of drugs in the facilities (For a list of all recommendations from the audit report, see page 25 of [ILR 2018-A](#) page 25 for all recommendations).

In Chapter II of this follow-up report, we describe the steps that Shelter the Homeless and The Road Home have taken to address the concerns identified in the 2018 audit. For example, Shelter the Homeless has contracted with an outside security firm to screen guests as they enter the facility. We found that the improved screening process has reduced the amount of drugs and other contraband entering the HRC. These and other improvements have created a safer and more secure environment. Still, substance abuse continues to be a problem at each of the facilities. Accordingly, this follow-up report offers several recommendations to further reduce drug use and other crimes.

## **Follow-Up Audit on Homeless Service Oversight and Accountability Will Be Released Later in 2021**

In addition to the safety and security concerns described in our May 2018 audit report, we released an additional audit report in December 2018 that examined the oversight, performance measures, and coordination of Utah's homeless services system. That second audit, [A Performance Audit of Utah's Homeless Services \(Report 2018-12\)](#), concluded that Utah's homeless services system lacked effective oversight and performance measures. The report also concluded that Utah needed to improve the coordination of the many different public and non-profit agencies providing services to the homeless. We will release a follow-up to this second audit later in 2021. That follow-up report will describe the progress made towards providing better oversight, planning, and performance of Utah's homeless services system.

### **Audit Scope and Objectives**

The scope of this follow-up audit is limited to the safety and security issues raised in our May 2018 audit report. We focus primarily on the conditions within three HRCs, including the

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**Chapter II describes the progress that has been made since our 2018 audit.**

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**Chapters III and IV describe some of the safety and security concerns that still exist and several strategies to address them.**

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Geraldine E. King Women’s Resource Center, the Gail Miller Resource Center and the South Salt Lake Men’s Resource Center. We also assessed the safety and security of the Midvale Family Resource Center and Palmer Court. To complete our assessment, the audit team conducted the same set of tests performed during our first audit. They include:

1. A review of incident reports prepared by resource center staff and security guards.
2. On-site inspections at each facility, including late-night visits with public safety officers.
3. Interviews with resource center staff, guests and law enforcement officers.
4. Review of security camera videos.
5. Review of the safety policies and protocols that were drafted since May 2018

After completing the above audit steps, we concluded that Shelter the Homeless and the Road Home have made considerable progress toward providing a safe and secure environment for individuals who are experiencing homelessness. However, we also found areas that need additional improvement. Specific audit findings are described in the following chapters:

- Chapter II describes progress made with regard to new policies, procedures, and security features specific to drugs and contraband entering the HRCs.
- Chapter III describes the ongoing substance abuse and other crime that continues to be a problem and recommends steps that HRCs can take to further strengthen security.
- Chapter IV describes broad problems associated with homelessness that impact the HRCs—including substance abuse and mental illness—that can only be addressed through a community-wide effort. These challenges are impacting the safety and security of the HRCs, but cannot be addressed by the resource center operators alone.

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**The results described in this report are based on many of the same tests we performed during our 2018 audit.**

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## **Chapter II**

# **Safety and Security Have Improved at Homeless Resource Centers**

In the three years since our May 2018 audit, safety and security at Salt Lake County's homeless resource centers (HRCs) have improved. In response to audit findings, The Road Home and Shelter the Homeless adopted new safety protocols which they have applied at their three new HRCs. Additionally, the physical design of the HRCs includes safety features that were lacking at the former downtown shelter. As a result, HRC guests are less likely to encounter drug use, theft of personal items, and general disorder that was prevalent at the previous facility. We also found that two of the cities where HRCs are located have used their land use authority to help ensure that HRCs implement their improved safety policies. Finally, the local police departments have created special units to promote safety and security at the HRCs and in surrounding neighborhoods.

We are encouraged by these improvements. However, as discussed in Chapters III and IV, further improvements can be made to increase overall safety and security for HRCs and guests.

### **New Policies Have Contributed to Safer, More Secure Homeless Resource Centers**

The Road Home and Shelter the Homeless have addressed one of the key concerns from the 2018 audit by adopting a new set of safety and security policies. Our 2018 audit report noted that shelter operators lacked strong policies and procedures governing the safety and security of their facilities. In addition, staff were not applying the policies that they did have. Since that time, The Road Home and Shelter the Homeless have developed better policies and procedures<sup>2</sup> and have worked to make sure the policies are implemented. For example, The Road Home has a new administrative officer who is responsible for ensuring that policies are properly implemented.

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<sup>2</sup> For the new security policies adopted by Shelter the Homeless, see Appendix A.

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**Safety and security at Salt Lake County's HRCs have improved since our May 2018 audit report.**

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**The Road Home and Shelter the Homeless have addressed one key concern by adopting a new set of safety and security policies.**

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We believe the application of these policies has improved the conditions within the resource centers. The following describes some of the key policies found in that document.

### **Improved Screening Process Is Used to Prevent Contraband from Entering the Resource Centers**

In response to concerns raised in our 2018 report, Shelter the Homeless has contracted with a private security company that provides security guards at each HRC. The guards screen guests for contraband before they enter the facility, make rounds of the building and perimeter, and may intervene when guests are found using drugs. The screening process includes:

- Use of magnetometer to screen for contraband made of metal
- Search of property such as bags, purses, or backpacks;
- Limited pat down searches when deemed appropriate, and
- Guests present a resource center issued ID card identifying them as a guest with an assigned bed, or if the card is lost, staff may verify they are a guest by calling up a photo of the guest in the registration system.

The new screening process is an improvement over the process we observed during our audit in 2018. The photo in Figure 2.1 shows a guest being screened at the Gail Miller Resource Center. The other HRCs follow a similar process. A person is asked to present their identification so staff can verify they are a registered guest. They then deposit their keys, cell phone, and other personal belongings in a bin on the counter. The guest is asked to pass through the magnetometer and are asked to lift his or her shirt to show nothing is in their waste band and lift the pant legs to show nothing is hidden in their socks. The bags are then searched for contraband and are returned to the guest. If illegal drugs or drug paraphernalia is found, it is confiscated, placed in a secure box, and the police are notified. However, as we suggest in Chapter III, we have identified several ways in which the screening process can be improved.

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**Safety and security at Salt Lake County's HRCs have improved since our May 2018 audit report.**

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**Figure 2.1 The Screening Process at the Gail Miller Resource Center.** To prevent guests from bringing weapons into the facility, each guest is asked to walk through a magnetometer. The contents of backpacks are searched, and guests are asked to show there is nothing is hidden in their pockets, waist bands or socks.

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Source: Gail Miller Resource Center Security footage

Incident reports prepared by security guards and HRC staff suggest that the new screening process has helped to reduce the flow of drugs and contraband into the facilities. These reports are prepared by staff whenever guests are found violating the HRC rules. We examined all incident reports from a three-month period prepared by the staff and security at three HRCs, revealing 185 incidents where the security intake process discovered a guest with drugs or paraphernalia. The following are actual cases as recorded in these incident reports.

- [Resident] came through the metal detector and [staff] checked his sock and found a pipe with a green leafy substance inside it that appeared to be marijuana. He left without issue. Substance was put in an envelope with the pipe and placed in the grey bin.<sup>3</sup>
- [Resident] was coming through the metal detector and [security] spotted a needle in his sock so [security] asked him if he had any illegal substances on him. He stated he had poppers and drugs in his rectum and that he had meth and needles in his shoes. He took the substance and needles out of his shoes. I called dispatch to pick up the substance.

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<sup>3</sup> This refers to a lock box for contraband that is later turned over to police.

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**Incident reports prepared by security guards and HRC staff suggest that the new screening process has helped to reduce the flow of drugs and contraband into the facilities.**

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- While searching the bags a male resident ...came through and inside his wallet we found a black bag with heroine inside of it. I told both [HRC staff] what I found and he was issued a warning for bringing in substance. We bagged it up and tossed it in the drug box bin. SLPD arrived to pick up the contents inside of the drug drop box.

These entries from incident reports, prepared by staff and security guards, demonstrate that the new screening process is reducing the amount of drugs and other contraband entering the facilities. However, as we describe later in Chapter III, the improved screening process has not prevented all drugs from entering the facilities.

### **New HRC Policies Require Staff to Work Closely with Local Law Enforcement**

New safety policies require HRC operators to work with law enforcement to address criminal activity within the facilities. For example, staff are now required to notify law enforcement of any criminal activity they observe. In addition, HRC staff are required to have regular safety and security meetings with local law enforcement and staff from the private security firm. Finally, the new policies recognize the need for police to have access to the facilities and security cameras. By adopting these policies and by requiring staff to follow them demonstrates a greater commitment to safety and security than we observed in the past.

**Resource Center Operators Have Agreed to Assist Law Enforcement in Addressing Crime in Their Facilities.** New policies (see Appendix A) recognize the need for HRC operators to work closely with law enforcement in responding to crimes committed within the resource centers. According to this agreement, the resource center operators will:

- Report to police all illegal activities on resource center property.
- Provide access and cooperate with law enforcement in preventing and investigating crime.
- Provide law enforcement with access to security camera recordings.

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**New safety policies require HRC operators to work with law enforcement to address criminal activity within the facilities.**

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- Allow the use of canine units throughout the shelter.
- Hold regular meetings with law enforcement and private security to review security related data and hold problem solving discussions related to recent security challenges.
- Use a trauma-informed approach when interacting with clients who violate expectations and seek to strike an appropriate balance between addressing the needs of individual client with the general safety of the staff and clients within the shelter and surrounding community.

By agreeing to these procedures, the resource center operators have demonstrated the intent that guests will be required to comply with the requirements for living at the HRC. These requirements include a ban on drug use, drug paraphernalia, and the possession of weapons. This is an improvement over conditions identified in 2018. The following describes evidence we found that the above policies are being implemented.

**Resource Center Staff Are Reporting Criminal Activity to Local Police.** The reports we received from both the resource centers and the police departments show that HRC staff are usually following policy and notify the police when drug related cases are identified. We found that incident reports often describe cases in which staff have encountered drug use, theft, or assaults within the resource center. In many cases, the incident report will also mention that the police were notified of the drug-related incident. On the other hand, there were some reports of drug related incidents that made no mention whether the police had been notified.

Reports provided by police departments serving South Salt Lake City and Midvale City also show that HRCs are responsible for a large number of police calls. For example, in 2020, the South Salt Lake Police responded to 333 calls on drug related charges at the Men’s Resource Center, in addition to 186 calls for theft-related charges and 44 calls for assault. The call volume from the resource centers shows the resource center operators typically do notify police when these events occur. Chapter III discusses how policies relating to criminal activity in the HRCs can be further improved.

**Police Officers Are Now Given Access to the Resource Centers.** Another policy agreed to by the resource center operators

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**Guest are required to comply with a set of requirements for living at the HRC which include a ban on drug use, drug paraphernalia, and the possession of weapons.**

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**Call volume from the resource centers show that HRC operators are notifying police.**

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The new policies allowing the use of “K9 units as need” is an improvement over conditions in 2018.

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gives police full access to HRCs, which was not always the case in 2018. The current policy recognizes an officer may need to contact a HRC resident who has an outstanding warrant or visit an HRC resident during a police investigation. Typically, the police will first notify the HRC operators that they plan to make the visit. If they need to access the building to address a time sensitive matter, the policy recognizes that police may need to enter the facility without prior notice.

**New Policies Allow Law Enforcement to Use Drug Dogs within the Resource Centers.** The new policies allow the use of a “K9 unit as needed.” We see this as an improvement over conditions in 2018 when shelter operators expressed reluctance to having drug dogs inside the shelter living area.

**New Policies Require HRC Staff to Hold Coordination Meetings with Law Enforcement.** These policies require the meetings to include representatives from the HRC, Shelter the Homeless, local law enforcement, and the private security service. We attended several coordination meetings and observed that the group discusses safety challenges and the implementation of new safety procedures. Participants in these meeting seemed to recognize that maintaining safety and security at HRCs is a shared responsibility. We did not observe these types of meetings in 2018.

**Policies Require the Use of De-Escalation Techniques When Engaging Angry Residents.** Another important way to enhance security at a shelter is for staff, security guards, and the police to have a presence in the facilities and to make regular rounds throughout the buildings. Routine rounds in the HRCs provide an opportunity to interact with the residents and identify any inappropriate behavior. On several occasions we accompanied staff, security guards, and police as they made their rounds through the building. It was not uncommon for resource center staff to encounter guests who were agitated or acting aggressively towards staff or other guests. We found the staff, security, and police were effective at de-escalating the situation by engaging the guests in a manner that helped them calm down. The staff, security guards and the police all appear to have the experience and training necessary to effectively engage those who may suffer from trauma or mental illness.

## **New Resource Centers Include Many New Security Features**

The new resource centers include many design features which enable staff to better monitor guest activities. The former downtown shelter included areas in each dorm where guests could congregate unseen by staff or security cameras. As a result, it was difficult for staff to respond to reports of theft, assault, and other misconduct. To address this problem, the new shelters include design features that enable staff to monitor conditions in each dorm. For example, most dorms contain staff observation rooms as well as security cameras that enable staff to monitor conditions in the dorm. Furthermore, to avoid theft of personal items, guests are provided with storage bins. While new measures have improved the safety and security features at the HRCs, in Chapters III and IV we discuss areas where additional improvement is needed.

### **Staff Observation Rooms Are Attached to Most Dorm Rooms**

The larger dorm rooms now include an attached observation room with windows that enable staff to monitor the bunk area without disrupting guests. There are also security cameras positioned throughout the buildings. These new design features enable HRC staff to monitor activities in the dorm areas. Figure 2.2 shows an observation room and security camera in one of the dorm rooms at the Gail Miller Resource Center.

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**The new resource centers include many design features which enable staff to better monitor guest activities.**

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**Figure 2.2 Dorm and Observation Room.** When staffing allows, an employee may be assigned to the observation room to monitor activity in the dorm area and provide assistance to residents.



Source: Phot of the Gail Miller Resource Center.

The observation rooms are a feature in the new resource centers that were not included in the former downtown shelter. They show that the physical layout of the new facilities was designed with security in mind. The use of active cameras was an observed improvement since 2018.

### **Locked Storage Bins May Be Used for Personal Belongings**

One problem faced by residents of the previous downtown shelter was that they had no place to safely store their personal belongings. Some guests reported that they had items stolen while they were asleep. To address this concern, each of the three new HRCs are equipped with a storage room, where each guest is allotted two plastic bins to store their belongings (see figure 2.3). These storage areas have limited access and are controlled by staff. In addition to the storage area, each bunk comes with a lockable plastic bin.

**Each of the three new HRCs are equipped with a storage room where each guest is allotted bins to store their belongings.**

**Figure 2.3 Personal Storage Available to Resident Has Improved.** HRCs were designed to provide various storage options for residents.



Source: Auditor Photo from Gail Miller Resource Center

The photo on the left of figure 2.3 shows the storage available under individual bunks. The photo on the right shows additional storage available to residents in a locked room. HRCs also have indoor bike storage for residents to safely store their bikes.

### **The Resource Centers Are More Secure Than the Pervious Downtown Shelter**

HRCs were designed to provide services for those experiencing homelessness. The new facilities provide large common areas, smaller dorms, single dedicated entrances, and numerous security cameras. The single dedicated entry allows for better control and screening of those entering and exiting the facility. We observed that alarms are working and rounds are being done frequently to ensure these are working properly. While improvements have been made, Chapter III of this report provides areas where policy can be clarified or more closely followed.

**The new facilities provide large common areas, smaller dorms, single dedicated entrances, and numerous security cameras.**

## **Cities Have Taken Steps to Improve Security Standards of New Resource Centers**

The cities where the three new HRCs are located have used their authority to regulate land use to require that certain safety and security standards be followed. This action has helped to reenforce the cities' intent to improve the safety of the shelters. We also found that local police have created special units to address homeless issues.

### **South Salt Lake City Has Included Security Requirements in Its Conditional Use Permit**

Of the three cities where resource centers are located, South Salt Lake City is the most assertive in using its land use authority to impose safety and security requirements on the HRC in its community. The permit includes recommended safety and security policies that the HRCs have agreed to follow. By placing security policies in the conditional use permit, the resource centers are obligated to comply with those policies. See Appendix B for safety requirements included in the conditional use permit.

### **Salt Lake City Required Shelter the Homeless to Obtain the City's Approval for Its Security and Operations Plan**

Unlike its neighbor to the south, Salt Lake City did not include a list of security standards within its conditional use permit. Instead, the city required that Shelter the Homeless submit a detailed security and operations plan before receiving approval to build the facility. The city required that the city's police department approve the plan. (See Appendix C for more information.)

In effect, both South Salt Lake City and Salt Lake City have used their role as the local land use authority to impose safety and security standards on the HRCs. Consequently, the resource centers are obligated to maintain a safe and secure environment and comply with the standards they agreed to when the facilities were built.

### **Midvale City Also Requires a Safe and Secure Family Shelter**

Midvale City has not used its power as the land use authority to impose safety and security requirements for the Midvale Family Resource Center. The Road Home, which operates the facility, was given a conditional use permit which was amended in 2005, before

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**Both South Salt Lake City and Salt Lake City have used their role as the local land use authority to impose safety and security standards on the HRCs.**

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security became a major concern. That permit does not include specific safety and security requirements as do those of Salt Lake City and South Salt Lake City. Even so, Midvale City and the Unified Police Department have maintained a high level of involvement in security matters at the HRC. Though not formally obligated to do so, The Road Home has committed to maintaining the same level of safety and security at the Midvale Family Resource Center as it does at the other two HRCs it operates.

### **Local Police Have Created Special Units to Address Homeless Issues**

To strengthen security in and around the HRCs, police departments in Salt Lake City, South Salt Lake, and Midvale have created special units to address homelessness. South Salt Lake and Midvale have funded these homeless resource officer teams in part through the Homeless Shelter Cities Mitigation Restricted Account, funded through a special legislative appropriation. Typically, officers assigned to these teams have shown an ability to work effectively with the homeless population. These officers also participate in the regular safety review meetings held with HRC operators. Salt Lake City also has specialized teams that focus on providing supportive services to those experiencing homelessness or mental health crisis.

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**Salt Lake City, South Salt Lake City, and Midvale City have created special outreach teams to address homelessness.**

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## **Chapter III**

# **Opportunities Exist for Resource Centers To Further Reduce Criminal Activity**

Although conditions have improved at the homeless resource centers (HRCs) in Salt Lake County, drug use and other criminal activity continue to be a problem. This conclusion is based on our review of drug cases described in incident reports prepared by staff, our own observations of drug use in the facilities, and statements by guests who have observed drug use in the facilities. This chapter describes several steps that can be taken to further improve the safety and security within the HRC facilities. However, as suggested in Chapter IV, there is a limit to what the resource centers can do on their own. Reducing crime in these facilities requires greater involvement from law enforcement, treatment providers, and other community partners.

### **Resource Center Residents Continue to Struggle with Drug Use and Other Crimes**

Notwithstanding the improved security described in Chapter II, problems with drug use, theft, weapons, and assault still occur within the HRCs. Considering that many residents suffer from drug addiction and mental illness and that many have lengthy criminal records, it is unlikely that HRCs will ever be completely free of this activity. Even so, we believe opportunities exist to further improve the safety and security within these facilities.

### **Internal Reports Show Contraband Is Still Being Found within Resource Centers**

While we have seen a reduction in incidents within the HRCs compared to the former downtown shelter, incident reports show contraband is still present at resource centers. We reviewed reports prepared by HRC and security staff to determine the number of cases where contraband had entered the facilities. The reports show that drug use, weapons, theft, and assault still occur within the resource centers. While a large amount of contraband is caught during the screening process, incident reports indicate that some drugs and drug paraphernalia make it through undetected.

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**While there has been a reduction in incidents, contraband is still present at the HRCs.**

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**We reviewed three months of incident reports for the three new resource centers and found drug related incidents are occurring far less frequently than in 2018.**

**Reports of Drug-Related Incidents Have Declined Since 2018.** Our review of incident reports suggests that the overall number of drug-related incidents at HRCs has declined over the past two years. Our May 2018 audit report describes a study we did of incident reports from an 18-day period in January 2018, during which security personnel documented over 100 cases of drug related activity at the downtown shelter. We reviewed three months of incident reports for the three new resource centers and found drug related incidents are occurring far less frequently than in 2018. Seasonal differences in the resident population, along with changes related to the Covid-19 pandemic, may have affected this data. Still, the decline in reported drug-related cases is large enough to suggest that the improvements in safety and security protocols have had a positive effect.

We acknowledge that it is extremely difficult to eradicate the presence of drugs and paraphernalia at the facilities due to the nature of the population at the resource centers and the reasonable limits of security searches.

**Drug Use, Weapons, Assault, and Theft Are Still Present at HRCs.** Using incident reports, we were able to identify the total number of cases involving drug use, weapons, assault, and theft reported in September, October, and November of 2020. The results are show in Figure 3.1

**Figure 3.1 Incident Reports Show Cases of Drug Use, Weapons, Assault, Theft.** The reports show that the drug use is the most common violation of resource center rules. It is not surprising considering that many guests suffer from addiction to controlled substances. A majority of the incidents are discovered during the screening at the intake desk.

HRC	Drug Related	Weapons	Assault	Theft
Gail Miller Resource Center	46	5	9	12
Geraldine E. King Center	169	54	27	27
Men’s Resource Center	124	21	39	31
<b>Total</b>	<b>339</b>	<b>80</b>	<b>75</b>	<b>70</b>

*Source: Incident Reports provided by The Road Home, Volunteers of America, and Premier Security.*

Figure 3.1 shows an unduplicated count of cases described in incident reports prepared by staff and security guards. The reports show that many drug and weapons related incidents are caught at the intake

desk. However, as shown in the next section, many violations are committed by guests after they have been screened and have entered the facility.

### **Staff Are Finding Drugs and Weapons Inside the Facilities.**

As effective as the screening process is at the front entry way, the incident reports also show that some drugs and drug paraphernalia are still finding their way into the facilities. That means that some guests are finding a way to take the prohibited materials through the screening process undetected.

Three months of incident reports for the Men’s Resource Center showed that 51 drug-related incidents happened during the security screening process, compared to 36 drug-related incidents happening inside the center after individuals had been through security. Another 37 incidents occurred outside the screening process, or the exact location was not identified. Similarly, staff and security reports showed 80 weapons related incidents over three months at all resource centers, with only 11 of these occurring past the security screening process.

Considering the screening and search procedures used at the entryway to each facility, along with the use of a magnetometer, it is unclear how contraband enters the HRCs. Some residents told us that their fellow guests are hiding the material inside their clothing in places that are not searched by security.

In sum, the incident reports show the screening process has been somewhat successful in preventing contraband from entering the HRCs. However, the reports also show that guests are still able to get some of that material past the guards and the magnetometer. It is uncertain how many guests bring drugs and weapons without being detected. Based on our own observations and interviews with HRC residents, we believe there are opportunities to reduce the prevalence of contraband and improve safety in the resource centers.

### **Audit Team Also Found Evidence of Drug Use**

In addition to staff reports of drug use and other criminal activity, our audit team also observed evidence of drug use during our visits to the resource centers and on the video recordings from the HRC security cameras. Finally, about half of the residents we interviewed also reported having used drugs themselves or having seen others with

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**Our study of the incident reports prepared by staff showed they are most likely to uncover prohibited drugs and contraband during the security screening process.**

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**Reports show that guests are still able to get contraband past the guards and the magnetometer.**

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drugs in the facilities. Based on this information, we conclude that drug use is still occurring within the resource centers. It suggests that resource center operators should take additional steps to improve the safety and security within the facilities.

During our 2018 audit, we made late-night visits to the downtown shelter and other facilities operated by The Road Home. During those visits, we observed evidence of drug use. As part of our follow up review, we decided to make similar late-night visits to see if conditions had improved since the construction of the three new resource centers. As in 2018, we were accompanied by officers from the Utah Department of Public Safety, who commented that conditions had improved significantly since 2018. Unlike the chaos we observed during our visit in 2018, a curfew was in effect and lights were out in the dorm area and most guests were sleeping.

We did, however, observe evidence of drug use during those visits. During a visit to the Men's Resource Center, the officers who accompanied us said they could smell spice as they approached the facility. As we entered the open courtyard area inside the facility, we witnessed a resident slump over and pass out from the effects of smoking spice. We also observed a resident suddenly become nervous when he saw the officers enter the courtyard. The individual tossed drug paraphernalia in the garbage and quickly left the area. Figure 3.2 shows the pipe and some of the other items discovered during these visits.

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**We did observe evidence of drug use during our late-night visits with law enforcement.**

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**Figure 3.2 The Audit Team Found Evidence of Drug Use at Resource Centers.** The photos show a used spice joint, a discarded pipe, and a used syringe.

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*Source: Auditor visit to Men's Resource Center*

The above photos show some of the drug paraphernalia we found during our visits to the HRCs and the surrounding neighborhoods.

There is not an objective way to assess the amount of drug activity in and around the resource centers. However, our general impression is that conditions have improved. For example, in 2018, we found syringes and other drug paraphernalia scattered about the parking lot and the commons area of the Palmer Court, a permanent supportive housing project operated by The Road Home. During our visits in 2020, we found no evidence of drug paraphernalia at Palmer Court. However, we did find drug paraphernalia in the neighborhood near the Gail Miller Resource Center.

Similar to our process in 2018, we reviewed security camera recordings and interviewed HRC guests to assess drug use in the facilities. Security camera recordings revealed three guests smoking what appeared to be a spice joint. Of the 23 guests we interviewed, nearly half (11 people) indicated that they had either used drugs in the facilities, had been offered drugs, or had seen evidence of other guests using drugs.

Although conditions have improved, HRCs continue to struggle with the challenge of drug use and other crimes in their facilities. Given the sociodemographic realities of the population served by HRCs, it is likely that this problem will persist. The following section describes several steps HRCs should consider to further reduce the level of drug use and other crimes in their facilities.

## **Resource Centers Can Continue to Improve Their Response to Drug Use and Crime**

As mentioned in Chapter II, shortly after our audit in 2018, the homeless resource centers developed a list of recommended strategies for addressing drug use and crime within their facilities. See Appendix A of this report. The cities where each resource center was built also required as part of their permitting process that certain security measures be adopted at each facility. Although eliminating all drug use and criminal activity from facilities may not be realistic, the following recommendation may complement ongoing efforts of HRCs to curb illegal activities.

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**Although conditions have improved, HRCs continue to struggle with the challenge of drug use and other crimes in their facilities.**

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**A list of recommended strategies for addressing drug use and crime within HRCs have been developed.**

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## Improve the Screening Process as Guests Enter the Facilities

One way to improve security is to ensure proper screening at the front entrance. We recommend the required screening process be applied to every guest, every bag, and every coat pocket. The following requirements are listed in the Safety and Security Policies and Procedures issued by Shelter the Homeless:



The infographic is set against a light blue background and contains four distinct sections, each with an icon and a text block:

- Magnetometer:** An icon of a metal detector archway is positioned to the left of the text: "Individuals entering Homeless Resource Centers will be required to walk through magnetometers".
- Pat Down:** An icon of a hand is positioned to the right of the text: "Individuals entering Homeless Resource Center may be subject to limited pat down searches as determined by the operator".
- Magnifying Glass:** An orange magnifying glass icon is positioned to the left of the text: "A more in-depth search of individuals will be conducted if anything is detected by the magnetometer".
- Bag:** An icon of a briefcase is positioned to the right of the text: "Personal property such as bags, purses, or luggage will be search upon entry".

Icon made by Freepik from [www.flaticon.com](http://www.flaticon.com)

We found that security guards and the HRC staff who assist them, are sometimes not as thorough as they should be in searching guests and their personal belongings. We observed instances in which coat pockets were not examined and backpacks were opened but not thoroughly searched. In some cases, personal items were not searched at all. Occasionally, we observed a guest walking through the intake area without being searched or passing through the magnetometer.

We raised these concerns with the owner of the private security firm responsible for screening guests. The owner said he would encourage his staff to use more care in screening guests. He also said additional trainers would be sent to the HRCs to provide guards with on-site instruction on how to properly perform the searches. We recommend that all security guards, and all HRC staff who assist them, receive ongoing instruction on how to properly screen guests.

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**We found that security guards and HRC staff were sometimes not thorough in searching guest and their personal belongings.**

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## Utilize a Canine Unit to Identify Drugs in the Facility

Security protocols of Shelter the Homeless allow law enforcement to use canine units to uncover drugs at the HRCs. The policy states:



Law enforcement may utilize a K9 unit as needed. Law enforcement agrees to respect the confidentiality and privacy of the clients to the extent possible. Law enforcement should also coordinate with Homeless Resource Center operators prior to access, when possible

*Source: Shelter the Homeless, Homeless Resource Center Policy and Procedure Handbook.  
Photo: Officer Michael Terry and Ike, a drug sniffing dog, at The Road Home downtown shelter, 2018.*

Several law enforcement agencies in Salt Lake County have drug sniffing dogs. The private security firm employed by Shelter the Homeless also has acquired a drug sniffing dog. In the past, K9 units have been successfully deployed at the downtown shelter. Resource centers in other parts of Utah and in other states also use canine units. Specifically, Switchpoint in St. George, Utah and the Haven for Hope in San Antonio, Texas, both report having K9 units in their homeless resource centers. Haven for Hope said the drug dogs are given access to all parts of the facility and that searches are done at random, unscheduled times.

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**K9 units should be invited into the HRCs and their visits should be done at random, unannounced times.**

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Due to the Covid-19 pandemic, there has been concern for the potential of exposing the dogs and their handlers to the virus during searches of HRCs. For this reason, the K9 units have not been used during the past year. We recommend that once the heightened risk of Covid-19 has passed, that canine units be invited back to the HRCs and that their visits be done at random, unannounced times.

### **Reevaluate Staffing Requirements at Each Facility**

We also recommend that Shelter the Homeless consider whether each HRC has a sufficient number of staff and security guards to effectively monitor guest activities. The current staffing requirements were established in the conditional use permits that were issued to Shelter the Homeless before the resource centers were built. For example, when applying for a conditional use permit from South Salt Lake City, Shelter the Homeless said it would apply the following staffing levels:



*Source: Shelter the Homeless Conditional use permit issued by South Salt Lake City.*

The above standards were set before Shelter the Homeless had a full understanding of the demands that would be placed on the security staff. For example, security guards are expected to make regular rounds of the facilities, screen the guests at the entrance, and patrol the outside perimeter of the building. Occasionally, the guards must respond to a guest in crisis. In addition, the conditional use permit issued by Salt Lake City indicates that security guards should also address any loitering along the streets adjacent to the HRCs. Now that the facilities are operational, Shelter the Homeless may find that

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**The current staffing requirements were established in the conditional use permits that were issued to Shelter the Homeless before the resource centers were built and should be reevaluated.**

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**Shelter the homeless set a standard of 0.35 state-licensed, insured and bonded private security guards per 30 residents.**

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**Now that the facilities are operational, Shelter the Homeless may find that their required staffing levels are inadequate to address all the needs of HRCs**

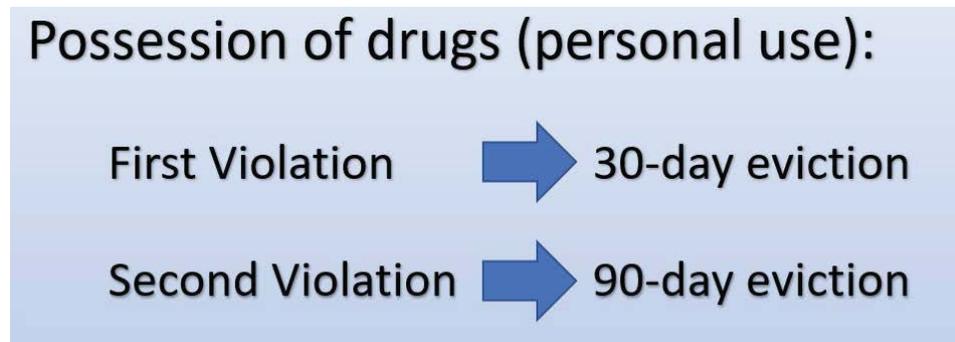
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their required staffing levels are inadequate to address all the needs of HRCs.

### **Shelter the Homeless Should Provide Guidance on How to Respond When Guests Use Drugs and Commit Other Crimes**

Another way to reduce drug use and other crime in the resource centers would be for Shelter the Homeless to develop a set of Expectation Protocols and require that they be followed. Currently Shelter the Homeless has a set of policies that describe the recommended response when guests are found violating the rules against drug use, theft, assault and other misconduct. These Expectation Protocols can be found in Appendix D. However, we found these policies are rarely followed.

**Shelter the Homeless Policies Describe the Recommended Response to Those Found Violating Facility Rules.** Shelter the Homeless has developed guidelines describing how staff should respond to different types of violations such as drug use, destruction of property, or possession of a weapon. For example, Figure 3.6 shows the recommended response for guests found in possession of illegal drugs.



*Source: Shelter the Homeless Expectation Protocols, See Appendix D of this report.*

The sanctions described above are consistent with the position that Shelter the Homeless has taken, that they do not tolerate drug use within their facilities. In addition, this policy is similar to those followed by three other homeless resource centers we contacted in Utah and in Texas.

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**We found many different responses to cases of drug possession in the HRCs and the 30-day eviction was rarely applied.**

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**The Recommended Response to Drug use is Rarely Followed.** We found that the resource centers rarely apply the recommended 30-day eviction policy when drug use is found within the resource centers. One reason is that the policy instructs staff to “exercise discretion in handling each situation based on the severity of the issue(s) and the circumstances involved.” As a result, we found many different responses to cases of drug possession in the resource centers and that the 30-day eviction was rarely applied. In a study of 18 incidents from the four resource centers, we found only one case in which the recommended 30-day eviction was applied. Many received nothing more than a verbal warning. Of the cases we reviewed from the men’s resource center, we found the most common response was a two-hour “cooling off period” during which the guests are asked to leave the building. Our concern is that if nearly every case is treated as an exception to policy, it suggests the recommended 30-day eviction is not being seriously considered.

**Shelter the Homeless Should Provide Better Guidance on How to Respond when Guests Use Drugs and Commit Other Crimes.** We acknowledge how difficult it must be for HRC operators to provide a fair and consistent response to those who violate facility rules. This difficulty is compounded by the fact that many residents suffer from mental illness and substance abuse. Even so, the resource center operators have been advised to impose a 30-day eviction to those found using illegal drugs in the facility. If that is the policy, we would expect it to be applied in a majority of cases.

Ideally, residents found using drugs or committing criminal acts would not be returned to the streets but instead redirected to a more appropriate residential treatment facility or a low barrier alternative to a resource center. However, those options are limited. As discussed in Chapter IV and in an upcoming audit report, the challenge we face is how to develop a continuum of care that addresses the need for additional residential treatment options. Until those options are developed, Shelter the Homeless needs to provide resource center operators a clear policy regarding how they should respond when guests are found using drugs and committing other illegal acts. We recommend that Shelter the Homeless work with the local law enforcement agencies, human services agencies, and other community stakeholders to develop such a policy.

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**As will be discussed in Chapter IV, and in an upcoming audit report, the challenge we face is how to develop a continuum of care that addresses the need for additional residential treatment options.**

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## Recommendations

1. We recommend that Shelter the Homeless consider deploying K9 units at resource centers, that they be used throughout the facilities, and that their visits be done at random and unannounced times.
2. We recommend that Shelter the Homeless consider whether current staffing levels are adequate to effectively monitor HRC residents.
3. We recommend that Shelter the Homeless provide the resource center operators with clear guidance for responding to violations of resource center policies.

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## **Chapter IV**

# **Resource Centers Require Support from Public and Nonprofit Partners**

It is important to recognize that the problems discussed in Chapter III regarding substance abuse and other issues in homeless resource centers (HRCs) are symptoms of a larger problem. That problem is how to best serve chronic homeless individuals who suffer from substance abuse and mental illness. This chapter describes some of the challenges faced by the population currently residing within the HRCs. We recommend that HRC operators continue to work with public and nonprofit partners to apply best practices in safety and security.

The larger issues associated with chronic homelessness will be discussed in a separate audit report to be released by our office later in 2021. The audit report will discuss planning, governance, and accountability within Utah's homeless services system.

### **The Resource Centers Serve A Challenging Population**

The prevalence of drug use, assault, and theft within HRCs reflects the fact that resource centers serve a challenging, high-risk population. We found that more than half of the residents served at the men's resource center have a history of substance abuse, mental illness, or both. One third have felony convictions, which can make it difficult to find employment and housing. In sum, we found that a majority of the residents at HRCs face serious barriers to overcoming homelessness. Lacking treatment for addictions and mental illness, many residents find it difficult to comply with HRC rules such as not using drugs in the facility.

While we applaud the efforts to link high-risk residents to appropriate services, many residents are languishing in the resource centers because they refuse such services or because space is unavailable in residential treatment programs. As a result, residents remain in the HRCs, which are not ideally suited to addressing their treatment needs.

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**While we applaud the effort made to link high-risk residents to services, many guests are languishing in the resource centers because they refuse services or because space is not available in residential treatment programs.**

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## Many Homeless Individuals Suffer from Substance Abuse, Mental Illness, and Criminal Histories

We found most residents of the Men’s Resource Center face serious obstacles to ending their homelessness. A majority suffer from substance abuse and mental illness. Many have criminal backgrounds that make it difficult for them to qualify for housing and certain types of jobs. As a result, most residents require not only subsidized housing but also treatment for substance abuse and mental illness. This conclusion is based on our study of all guests at the men’s resource center on December 7, 2020, are summarized in figure 4.1.

Drug addiction and mental illness can be serious barriers to overcoming homelessness.

**Figure 4.1 A Majority of Guests of Men’s HRC Have Had Prior Experience in the Criminal Justice and Mental Health Systems.** Of 271 guests at the Men’s Resource Center on 12/7/20, we found 61 percent had a prior arrest on drug charges or had received treatment for drug addiction or mental illness. These challenges can be an obstacle to overcoming homelessness.

Currently	271	(100%)
Under state supervision (AP&P)	40	(15%)
During the past 5 years		
Incarcerated in jail and/or prison	95	(35%)
Incarcerated in jail, prison, and/or under state supervision	113	(42%)
Received treatment for substance abuse	89	(33%)
Received treatment for mental illness	82	(30%)
Received drug-related charges	103	(38%)
Received drug-related charges and/or drug treatment	126	(46%)
<i>Received drug charges, treatment for drug addiction and/or mental illness.</i>	166	(61%)
Anytime in the Past		
Arrested for drug distribution	12	(4%)
Convicted for a sex offense (registered)	17	(6%)
Convicted for a felony offense	88	(32%)
Charged with a violent crime	95	(35%)

*Source: OLAG study, based on data from December 7, 2020.*

Our results show that of the 271 guests in our study, 32 percent have had a felony conviction, 46 percent had a problem with drug use in the past five years, and 61 percent had a drug or mental health problem during the past five years. That means many residents at the men’s resource center face serious obstacles to ending their homelessness. Nearly half of the residents have received drug addiction and mental health treatment in the past and may require years of

We found a majority of guests at the Men’s Resource Center had experience with drug use or had struggled with mental illness.

additional treatment before they will be able to function independently.

Another concern is that many have been previously enrolled in some type of publicly funded shelter or housing program. In fact,

- 34 percent had spent more than 200 days in a homeless resource center during the prior two years
- 18 percent had already received assistance through the rapid rehousing program, and
- 7 percent had lived previously in permanent supportive housing.

Return to homelessness, after having received publicly funded housing, suggests that some individuals require more services. In addition to housing, many also require treatment for mental health and substance abuse.

What our study does not show is the large number of individuals who face few barriers to independent living and whose stay at the resource center is relatively brief. These individuals may receive rapid rehousing support or other housing referral services and quickly find a new home. On any given day, this group represents the minority of residents. However, in terms of the overall population served, their numbers exceed that of the chronic homeless population.

### **HRCs Are Not Intended to Be Long-Term Residential Facilities for Those Suffering from Mental Illness and Substance Abuse**

Our analysis of the Men’s Resource Center shows that many residents face serious obstacles to overcoming their homelessness. However, the resource centers may not be an ideal setting to address the treatment needs of a homeless population. For this reason, a stay at the resource center should be brief and only last until they can be placed in housing, if they are ready, or in another location where they can receive both shelter and treatment. The lack of these other options has required many individuals to remain in the resource centers without the treatment they need.

**Shelter the Homeless Policies say HRCs Were Designed to Be Temporary Stopping Points, Not Long-Term Treatment Centers.** According to Shelter the Homeless, the purpose of the HRCs is to

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**Many guests at the Men’s Resource Center had previously been enrolled in a publicly funded housing program.**

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**Homeless resource centers are not ideally suited to addressing the treatment needs of a homeless individual.**

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provide emergency shelter and not to be a location where high-risk individuals receive services. Its policy handbook states that the purpose of HRCs is to “help those experiencing homelessness resolve their immediate crisis and rapidly return to stable housing.” Those with more serious barriers to housing would be offered “connections to long-term community support.” Furthermore, the notion that HRCs are to provide temporary shelter is reflected in state and federal goals to keep stays in homeless shelters be as brief as possible.

**Shelter the Homeless has Agreed to Transfer those Suffering from Drug Addiction and Mental Illness to a More Appropriate Setting.** The notion that the HRC is to be a temporary stopping point for those suffering from substance abuse and mental illness is reflected in an agreement between Shelter the Homeless and South Salt Lake City. As part of their conditional use permit authorizing the construction of the Men’s Resource Center, the city and Shelter the Homeless agreed that resource center operators would use a “guest screening system to promptly refer and transfer applicable guests to off-site rehabilitation and detoxification or mental health programs.”

However, this requirement assumes there are sufficient treatment options available for all the homeless individuals who are in need of services. As the following section suggests, Utah’s continuum of care for homeless services still lacks the capacity to meet the needs of all those in need of such services. As a result, some individuals remain in the homeless resource center until space comes available in a residential treatment program.

### **A Broader Array of Treatment Options Will Help Improve Homelessness in Utah**

Unfortunately, HRCs are limited in their ability to transition high-risk residents to other venues to receive needed treatment. This problem is described in the state’s Strategic Plan on Homelessness. The plan states:

A large percentage of individuals experiencing homelessness face mental health and substance use disorder challenges. In order to drive down the number of chronically homeless, first-time homeless and the number of persons who return to homelessness, Utah needs to increase access to treatment and supportive housing.

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**Once a resource center identifies a high-risk guest’s treatment needs they should be transferred to an off-site detox or mental health program.**

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**The state strategic plan on homelessness has identified a need for additional treatment and supportive housing.**

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The plan then calls for additional permanent supportive housing and additional mental health treatment programs to address the needs of the chronically homeless.

While several new permanent supportive housing projects have recently been completed, and more are currently planned, the current rate of growth has been insufficient to address the need. For example, Medina Place and Pamela's Place are two permanent supportive housing projects that were recently completed and a third, The Magnolia, is nearly completed. Until we develop additional permanent supportive housing, combined with supportive services, many who suffer from mental illness and substance abuse will remain in the resource centers.

The need for additional residential treatment programs are topics that will be discussed in a separate audit report of the state's homeless services. Until these additional housing and treatment options are available, the resource centers will need the support from law enforcement, human services providers, and other stakeholders to manage the high-risk population currently residing in their facilities.

### **Continue to Apply Best Practices For Safety and Security**

Local law enforcement and homeless services providers have developed a set of strategies to improve safety and security within the homeless community. These strategies are described in *Law Enforcement Best Practices* and are included in Appendix E of this report. The strategies were created by a multidisciplinary group shortly after our 2018 audit of three facilities operated by The Road Home. Since that time, much progress has been made towards implementing best practices. We recommend that law enforcement agencies, homeless services providers, and other community partners continue to work together to implement these best practices. The following are some of the best practices that should be given special consideration.

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**Even with the addition of several new permanent supportive housing projects this last year, the demand for such facilities is still not being met.**

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**Law enforcement and resource center operators should work together to apply the best practices for safety and security and homeless resource centers.**

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## **Provide a Consistent and Frequent Law Enforcement Presence**

The best practices adopted by law enforcement and homeless service providers recommend that each police department serving a resource center in Salt Lake County create a homeless outreach team of officers that offers a frequent, consistent, and positive interaction with homeless individuals. The best practices state:

**Law enforcement agencies should proactively engage in consistent and positive interaction with people experiencing homelessness. Providing the same patrol officers in an area on a consistent and frequent basis allows officers to know the community, build trust, establish a level of accountability, and utilize informed discretion when taking enforcement actions.**

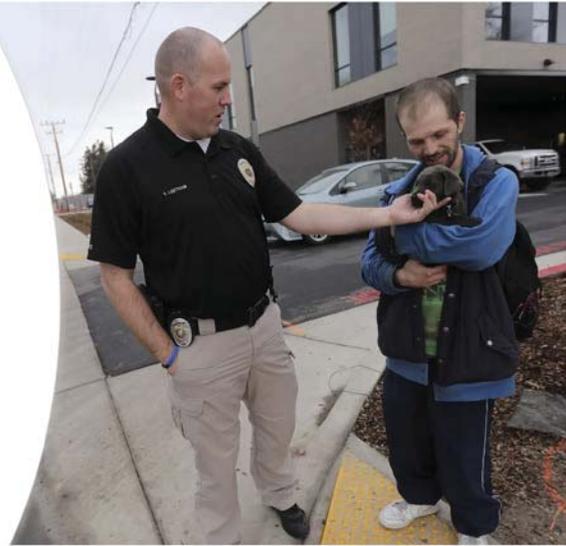


Photo Source: Deseret News

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**South Salt Lake has formed a homeless outreach team that engages the homeless community in a consistent, frequent and positive manner.**

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This best practice could be described as a form of community policing that serves homeless individuals. Through positive interactions, police can build a personal relationship with the homeless, help them connect with services and develop sufficient confidence in the police to share information regarding criminal activity within the homeless community. We recommend each community consider implementing the best practices adopted by law enforcement and homeless service providers by creating one of these special police units.

**South Salt Lake City Has Created a Special Police Unit called a Homeless Outreach Team.** South Salt Lake City homeless outreach team is perhaps the best example we found of police unit that has a positive interaction with individuals who are homeless. The homeless outreach team provides law enforcement support to the men's resource center as well as to the homeless living in the neighborhoods surrounding the HRC.

We found the team does an excellent job of engaging the homeless population in a “consistent and frequent” manner just as the best practices recommend. On one occasion, we joined two officers from the outreach team as they made their patrols along the Jordan River Parkway and within the Men’s Resource Center. We found the officers used a personable approach when engaging homeless individuals. The officers knew the names and backgrounds of many of the homeless individuals we encountered. We also observed that the team was quick to address a homeless encampment the same day it was created. The officers were direct, but also polite as they encouraged the homeless individual to either move into a shelter or find other accommodations.

Midvale City also has a homeless outreach team which is staffed by the Unified Police Department. We did not go out with that team as we did the South Salt Lake Team. However, they report having a group of officers who are also actively involved with the homeless population. Their precinct captain reports the team has succeeded in helping several homeless individuals find housing.

**All Communities with a Homeless Resource Center Should Consider Establishing Some Form of Homeless Outreach Team.**

While many communities rely on their police departments in one way or another to address the effects of homelessness, we recommend that those departments serving a community with an HRC consider creating a homeless outreach team similar to those in South Salt Lake City and Midvale City. It would require assembling a team of officers who demonstrate special skill and sensitivity when interacting with the homeless population. In addition, the team of officers would need to be devoted full time to the task of building positive relationships with the residents of the HRCs, as well as the HRC’s management and staff. As in South Salt Lake and Midvale, the outreach teams would also provide a much-needed presence in the homeless camps near the resource centers. We believe this is a best practice that could provide considerable added support to the safety and security of the homeless resource centers.

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**Midvale’s homeless outreach team reports it has succeeded in helping several homeless individuals find housing.**

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## **Resource Center Operators and Law Enforcement Need to Share Information to Solve Common Problems**

The best practices also call on law enforcement and homeless services agencies to share information. This shared information should take two forms: (1) system-wide data, and (2) individual client data.

Regarding systemwide data, the best practices require:

**Shared data between the law enforcement agencies and homeless services systems provide an all-inclusive view, which can facilitate a more complete outcome for those experiencing homelessness.**

Regarding individual data, the best practices require:

**Law enforcement, service agencies, and municipalities should have a clear and consistent way to share identifiable information in order to provide wrap around services to each individual. This will increase public safety throughout out the state by identifying the criminal element who prey on the homeless.**

We found that HRCs and local law enforcement are doing a better job of sharing information than they did three years ago. Most criminal activity found within the resource centers is reported to the local police, usually through a phone call, but formalizing this reporting process would help improve outcomes.

**The Law Enforcement Best Practices Regarding Reporting Could Be Realized with Aggregate HRC Monthly Reports.** The best practices suggest this information should also be summarized in a format that can be used “to identify trends and inform service delivery.” In our view, one way to implement this best practice would be for each resource center to submit a monthly report summarizing the criminal activity to the local police department. The resource centers should also consider submitting the same monthly crime report to the Board of Trustees for Shelter the Homeless.

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**Homeless Resource Centers should provide law enforcement with information regarding the criminal activity within the resource centers.**

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**Homeless Resource Centers should provide a monthly report summarizing the criminal activity within their facilities.**

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**The Law Enforcement Best Practices Regarding Reporting of Individual Criminal Activity Could Be Formalized.** Furthermore, when a guest at the resource center has been found possessing or using illegal drugs, possessing drug paraphernalia or has committed another illegal act, a detailed report describing the incident should be submitted to the local police as well. Once a criminal act has been committed, the normal confidentiality requirements of client data no longer apply. To properly identify the individual, we believe the guest's personal identifying information should be reported, including name and date of birth, as well as the incident report prepared by staff. We believe each individual case and the response should be the topic of discussion during coordination meetings described in the following section.

**Continue Using and Improving Coordination Meetings to Share Information and Solve Common Concerns.** The best practices also suggest using coordination meetings to discuss both the broad strategies used to promote safety and security, but also to address the needs of "high utilizers" which we believe should include high-risk individuals who have used drugs or who have committed other criminal acts within the HRC. Those participating in the coordination meetings should use a team-oriented approach to address the needs of those guests. The best practices state:

**Regularly held meeting will be established between law enforcement, service providers, private security, and other stakeholders to have a clear understanding of current events, high utilizers, and a team-oriented approach to solving challenges.**



We attended several coordination meetings during which participants demonstrated a high level of cooperation and information sharing. The best meetings included discussions about individual guests who had violated resource center policies, had special behavioral needs, or required the involvement of law enforcement. The discussion focused on how the group might work together to

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**Resource Centers should also supply law enforcement with incident reports describing criminal acts committed within their facilities.**

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**The best coordination meetings include discussions about the "high utilizers" who reside at the homeless resource centers.**

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address the needs of individual guests and how best to respond to problematic behavior.

However, we also attended coordination meetings in which those in attendance did not discuss the needs of individual guests. As mentioned, individual guests who are found using drugs or committing other crimes should be reported to police. Those coordination meetings could be better used to discuss those committing illegal acts and carry out a “team-oriented approach to solving challenges.”

### **All Law Enforcement Best Practices Need to be Reviewed and Frequently Updated**

This chapter has described just a few of the items listed in *Law Enforcement Best Practices*. We believe these best practices offer an effective multidisciplinary strategy for addressing safety and security concerns, as well as the need for effective treatment for guests within the resource centers. We encourage law enforcement agencies, HRC operators, and providers of human services to work together to continually improve the implementation of all the best practices described in that document.

We also acknowledge the need to occasionally update the best practices. Soon the newly appointed state homeless coordinator and a restructured homeless coordinating council will develop new strategic plan for addressing homelessness. The Law Enforcement Best Practices may need to be revised to better meet the objectives and strategies described in that new plan.

## **Recommendations**

1. We recommend that homeless resource center operators work with their respective cities to improve law enforcement efforts to use a frequent, consistent, and positive approach when engaging the with homeless community.
2. We recommend that homeless resource centers improve information sharing with local law enforcement by submitting a monthly criminal activity report to the local police department and to the board of trustees for Shelter the Homeless.

3. We recommend that homeless resource centers improve the manner in which information is shared with local law enforcement by formalize the reporting of individual criminal activity.
4. We recommend that homeless resource centers continue to improve coordination meetings to ensure the needs of specific individuals who are high utilizers or high-risk guests of the resource centers are discussed.

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## **Appendices**

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**Appendix A**  
**Shelter the Homeless Safety and Security Policy**

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# Safety and Security Policy

Approved:	Approved by:	Policy No:
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## Policy

The Public Safety Task Group identified best practices for safety and security policy recommendations for the Homeless Resource Centers. Shelter the Homeless adopted these recommendations and have implemented the following policies:

- Homeless Resource Center operators and Shelter the Homeless will establish clear expectations with clients and staff regarding safety and security within the homeless resource center.
  - Client safety procedures upon entering Homeless Resource Center
  - Resource Center operators, working with private security, will be responsible for safety screening of clients entering the facility
  - Entry process including screening and search procedures will be posted at the entrance of each Homeless Resource Center
  - Individuals entering Homeless Resource Centers will be required to walk through magnetometers
  - Exceptions may be made for individuals with disabilities or other circumstances on a case by case basis
  - Individuals entering Homeless Resource Centers may be subject to limited pat down searches as determined by the Operator and/or private security
  - A more in-depth search of individuals will be conducted if anything is detected by the magnetometer
  - Personal property such as bags, purses, or luggage will be searched upon entry
  - Random searches within the facility may be conducted by staff and private security, if determined necessary to preserve safety of clients, staff, and guests
  - Law enforcement will not conduct intake searches as outlined in this policy. Searches by law enforcement will be only conducted for law enforcement purposes under guidelines established in law and department policy.
  
- Homeless Resource Center operators and Shelter the Homeless shall hold a regular safety review meeting with partners to assess safety within and on the property of the homeless resource center. Meetings will include problem-solving discussions, review of recent

safety challenges and safety data, and review of safety procedures related to each Homeless Resource Center. Participants in the meeting will include representatives from the homeless resource center, law enforcement, private security, and other partners as necessary.

- Homeless Resource Center operators and Shelter the Homeless shall provide access and cooperate with law enforcement in the prevention and investigation of crimes. Law enforcement may utilize a K9 unit as needed. Law enforcement agrees to respect the confidentiality and privacy of the clients to the extent possible. Law enforcement should also coordinate with Homeless Resource Center operators prior to access, when possible.
- Homeless Resource Center operators and Shelter the Homeless shall establish a clear and timely process to provide video footage to law enforcement officers investigating criminal activity.
- Homeless Resource Center operators will facilitate collaboration between clients and law enforcement resource officers in order to connect clients with services
- Homeless Resource Center operators will not permit illegal activities. Homeless Resource Center operators will coordinate with law enforcement to establish a process for the investigation of criminal activity. Homeless Resource Center operators will contact law enforcement to report crimes including but not limited to instances of illegal drug possession and/or use within or around the Homeless Resource Center property.
- Homeless Resource Center operators will have a list of prohibited items related to safety and will train staff on the policy and procedure for handling those items. The prohibited items will be reviewed with clients upon intake and will be posted visibly throughout the facility.
- Homeless Resource Center operators and Shelter the Homeless will utilize a multi-disciplinary approach involving law enforcement (when criminal) and private security when addressing both criminal and non-criminal concerns. Homeless Resource Center operators will refer to a violation grid for guidance related to the classification of a violation, decisions related to exiting patrons, and reporting individuals to law enforcement.
- Homeless Resource Center operators will utilize evidence-based techniques and best practices to work with clients who violate expectations, and reinforce Homeless Resource

Center expectations to remain in the facility.

- Homeless Resource Center operators will recognize circumstances where service restrictions are necessary and preserve the safety of the individual, others, and/or the facility. Homeless Resource Center operators will maintain restrictions that are comprehensive and reasonable. Homeless Resource Center operators and Shelter the Homeless will work with coordinated entry to identify other available sheltering and resource options for individuals barred from the facility.
- Homeless Resource Center operators, law enforcement, and private security will use a trauma-informed approach when interacting with clients who violate expectations and seek to strike an appropriate balance between addressing the needs of individual client with the general safety of the staff and clients within the shelter and the surrounding community.
- Homeless Resource Center operators and Shelter the Homeless, along with law enforcement and community sponsors, will engage and be responsive to community concerns regarding safety and security in the immediate vicinity of the Homeless Resource Center.

## **Procedures**

### **Screening and Search**

All individuals will be subject to completing a security screening process prior to entering the HRC. Each bag will be searched upon entry and each client will pass through a metal detector. Large tools, weapons, alcohol, drug paraphernalia and illegal items are not allowed in the HRC.

Tools and weapons (excluding firearms and knives over 6 inches) may be checked in with staff and securely stored during the individuals stay at the HRC. Other items will be disposed of in secure disposal bins.

All drug related paraphernalia found during the screening process must be reported and the local authorities notified. The operator or security officer who find the paraphernalia must complete a written statement for the local authorities specifying who, what, where and how they came to find the paraphernalia.

Two security officers must conduct the security screening, unless for any reason security is short staffed.

As individuals enter the screening they will be asked to:

- Dispose of any prohibited items in the provided secure disposal bins
- Place bags open on the screening table
- Empty bag contents into provided bins and/or screening table if necessary, to ensure thorough screening
- Empty pockets in provided bin
- Remove outerwear jackets and/or zip up hoodies. If wearing snow/pants/overall over other clothing items, clients will be asked to lower outerwear so the pockets of other remaining items can be emptied or checked.
- Submit to metal detection screening and if necessary personal security screening.
- Receive bags and belongings back after bag and metal detection screening is complete

This procedure applies to all individuals residing in shelter. Bag checks for guest visiting the operator, partner agencies, and volunteers will consist of visual checks and having them place any metal items in provided bin, so they can proceed through the metal detector. They may or may not be subjected to an intensive back check.

## **Prohibited Items**

Operators will not allow items into the HRC that may be used in a manner to cause serious bodily injury.. The prohibited items list will be reviewed with clients upon intake and will be posted visibly throughout the facility.

Work tools and any other items, which may be used in a manner that could cause serious bodily injury, must be checked into facility storage before the client is allowed into other areas of the shelter.

## **HRC Prohibited Items**

- Knives (over 6 inches)
- Guns (including BB guns)
- Spears and swords
- Clubs, sticks and staves
- Martial arts weapons
- Brass knuckles
- Stun guns
- Tasers

## **Items Requiring Mandatory Check-in**

- Work Tools (hammers, screwdrivers, crowbars, box cutters, etc.)
- Sports Equipment (golf clubs, baseball bats etc.)
- Camping equipment (hatchets, tent spikes, etc.)
- Knives (under 6 inches)
- Pepper spray/mace
- Razors
- Heavy flashlights (such as police style Maglite flashlights)
- Scissors

Please Note: This is not meant to be a comprehensive list of prohibited items/items requiring check-in. HRC staff and security personnel are fully authorized to make determinations regarding such items on a case-by-case basis.

## **Service Restrictions and Barring**

If a situation escalates to a point where the Operator determines that barring is appropriate, the following barring infrastructure will be applied and a note will be made on the clients file in UHMIS that will include details of the bar and the end date. Clients have the right to appeal their bar at anytime and can meet with the Operator to discuss an earlier re-entry to the HRC.

Clients barred from one HRC may be allowed into another HRC unless it's been documented as a “all shelter bar” in UHMIS. If a client is barred from all the HRC’s, UCA will communicate potential alternative resources and work closely with community partners to follow the system wide plan.

**Appendix B**  
**Excerpt from South Salt Lake City Conditional Use**  
**Permit Select Provisions Addressing Safety and Security**

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WHEN RECORDED PLEASE RETURN TO:

SOUTH SALT LAKE CITY  
220 E. MORRIS AVE SUITE 200  
SOUTH SALT LAKE CITY, UT 84115

FIRST AMENDED CONDITIONAL USE PERMIT

Location: 3380 South 1000 West  
Use: Homeless Shelter  
Zone: A-1  
APN: 152637702  
Fee Title Owner: Shelter the Homeless  
File Number:  
Date: 7 November 2019

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**Permit Issued to:** Shelter the Homeless  
310 South Main St.  
Salt Lake City, UT 84101

**Findings of Fact:**

1. On December 29, 2017, Shelter the Homeless ("Applicant") submitted an application for a Conditional Use Permit ("CUP") to develop a 79,055 square-foot emergency homeless shelter on 2.46 acres located at 3380 South 1000 West.
2. 3380 South 1000 West is situated within the Agricultural Residential (A1) District.
3. A homeless shelter is a conditional use in the Agricultural Residential (A1) District.
4. The proposed shelter would provide temporary emergency shelter for up to 300 persons.
5. The proposed shelter is designed and built for limited-stay use by a single-sex population.

71. A component of assisting each resident in transitioning to housing and employment is prompt resolution of any outstanding citations, arrest warrants, and required court appearances.
72. The Applicant has proposed to facilitate transportation for residents to enhance their employment opportunities, enable guests to attend required court appearances, and facilitate rapid rehousing throughout the Salt Lake Valley, away from the 1000 West facility environment.
73. The Applicant's facilitation of transportation services will minimize offsite migration of the shelter residents, the potential for criminal predation on pedestrians within the homeless community, and the potential for adverse impacts to the surrounding community that were occurring under the old homeless services model in the Rio Grande area.
74. The overwhelming majority of the projected emergency shelter residents do not originate from South Salt Lake City.
75. The 1000 West facility is not conveniently located near anything.
76. The Applicant warranted that its residents will be selected as appropriate for and will be referred to the 1000 West emergency shelter via a new, objective, Coordinated Entry System.
77. The diversion program is designed to direct homeless individuals into a detoxification facility or inpatient treatment, as needed, and to the greatest extent possible, to divert the homeless into housing ("Housing First") as the preferred alternative to residency in an appropriate emergency shelter within the Continuum of Care throughout the Salt Lake Valley.
78. As a result of its isolation, minimized public infrastructure, site design, and role within the broader Continuum of Care, the 1000 West emergency shelter is not an appropriate place for homeless individuals who have not been screened through the Coordinated Entry System.
79. The Applicant has identified a third-party organization to provide diversion and Coordinated Intake into Homeless Resource centers.
80. The overall Coordinated Entry System (diversion and Coordinated Intake) is designed to make appropriate connections and facilitate transportation whenever possible.
81. The Applicant's initial third-party organization to serve as the Coordinated Entry system provider is the Utah Community Action Network.
82. To the greatest extent possible, the Applicant will coordinate with the Utah Community Action Network to help ensure that persons referred to the shelter through the

use of metal detector to ensure the safety of facility personnel, each resident, and public safety personnel that may be called into the facility in response to an incident or to otherwise inspect the facility for compliance with law);

- f. confiscate any unlabeled prescription medication and prescription medication issued to a person other than that resident, and store each resident's prescribed controlled substance medication in the facility's medical commissary or other separate and similarly-secured location (for resident access at the prescribed intervals to prevent the proliferation of an active drug market in the facility);
  - g. provide separately secured storage for a limited amount of each resident's oversized or excess belongings;
  - h. call South Salt Lake City Police Department to report reasonable suspicion of criminal activity in and around the shelter;
  - i. facilitate transport of people with substance abuse disorders who have been assessed and approved for a treatment program to an appropriate facility within the Continuum of Care and away from the 1000 West homeless shelter, when there is space available in any other facility within the Continuum of Care;
  - j. call South Salt Lake City Police Department upon discovery of any Contraband;
  - k. call South Salt Lake City Fire Department upon discovery of any explosives;
  - l. report persons intoxicated to the point that they are a danger to themselves or to the community to the South Salt Lake Police Department or facilitate transport of the influenced resident into an appropriate facility within the Continuum of Care, outside the City of South Salt Lake;
  - m. maintain a daily list of current residents that is available to the City of South Salt Lake upon request;
  - n. inform each resident of the facility's services, amenities, and attached Standrads for guest conduct within and around the facility;
  - o. enforce the attached Expectation Protocols; and
  - p. post signage and clearly inform each person that anyone entering the facility and well as their belongings is subject to a canine search.
89. To prevent outside queuing, loitering, or breach of security protocols, and subject to certain exceptions provided herein, all persons must enter the 1000 West facility through a 3,153 square foot Waiting and Intake Area depicted in the first-floor plans attached hereto and be properly screened prior to entry into the facility and onto site beyond the Waiting and Intake area.

156. The facility was scheduled to commence operations in July of 2019.
157. Significant cost overruns, funding difficulties and unanticipated construction issues have delayed the intended opening date.
158. The Applicant proposed that it would employ onsite security personnel at a ratio of .35 state-licensed, insured, and bonded private security guards (or off-duty public safety officers) per 30 residents and will require such security personnel to patrol the site and the surrounding neighborhood, to prevent loitering near the facility and the potential for adverse offsite impacts from the shelter use.
159. The Applicant's proposed private security guard ratio will help mitigate the risk of violent or unlawful behavior at the shelter and will reasonably reduce the need for extraordinary public safety responses at the facility.
160. The Applicant proposed a staff to resident ratio at the facility of 1 staff member per 30 residents during the day and 1 staff member per 40 residents at night. These ratios include private security personnel.
161. The Applicant's proposed staff to resident ratio at the facility will help ensure that the site and facility is safe, clean, well-operated, and capable of offering substantial assistance to its residents in the transition from homelessness to housing.
162. The Applicant and the State of Utah are engaged in a sincere effort to break the cycle of human suffering, crime, and community degradation experienced in the Rio Grande area.
163. Homelessness is not a crime and the homeless should not be scapegoated nor considered as criminals.
164. Excellent facility management and a program that diverts:
  - a. qualified people to appropriate available housing as a first option;
  - b. people with substantial mental health issues to separate, offsite, specialized residential treatment centers within the Continuum of Care;
  - c. violent people to jail; and
  - d. active substance abusers to offsite detox and/or offsite, specialized residential treatment facilities in the Continuum of Care;

will allow the 1000 West facility to operate without many of the public safety problems and community degradation experienced in the Rio Grande area.

- b. The South Salt Lake City Police if the persons loitering near the facility do not heed security personnel's warning;
6. The Applicant shall not allow any portion of the site or facility to be occupied by animals except as required by the reasonable accommodation provision of the Americans with Disabilities Act or other federal or state law;
7. The Applicant shall install and staff a 24-hour phone number dedicated to reporting and resolving disturbances caused by the homeless population in the vicinity (quarter mile radius) of the shelter;
8. The Applicant shall develop and implement a dispute resolution system intended to de-escalate dangerous or volatile situations that may arise at the facility;
9. The Applicant shall not allow any person to use or occupy any vehicle, outdoor area, tent, or enclosure located on the shelter site or within its required off-site parking area, as a shelter for any period of time.
10. The Applicant, and all facility staff and service providers, shall allow for and facilitate periodic, unannounced searches by a canine accompanied by public safety personnel.
11. The Applicant shall post notice within the facility that all persons are subject to unannounced canine searches, as a condition of their occupancy;
12. The Applicant, and all facility staff and service providers, shall fully cooperate with law enforcement to encourage 1000 West facility residents to comply with lawful searches, lawful requests from law enforcement and to participate in the judicial system;
13. The Applicant and all facility staff and service providers shall, in coordination with the South Salt Lake City Court, facilitate transportation of residents to and from and encourage residents to attend all required court appearances;
14. The Applicant and all facility staff and service providers shall appear and testify, when subpoenaed, for any applicable court matter involving the 1000 West facility or its residents in any manner;
15. Regularly, and at least on a quarterly basis, the Applicant shall review actual public safety call volumes, identity of residents who need additional targeted services, and implement additional prevention efforts to mitigate the impact and severity of circumstances in the vicinity (quarter mile radius) of the facility that burden South Salt Lake City public safety resources.
16. These permit conditions have been mutually negotiated by both parties; and
17. The Applicant and the South Salt Lake City shall execute and record the Conditions of Approval imposed by this permit with the County Recorder's Office prior to occupancy.

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**Appendix C**  
**Shelter the Homeless Security Operations Plan**  
**Submitted to Salt Lake City**

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## **Salt Lake City Conditional Use Permit Homeless Resource Centers Security & Operations Plan**

### **Background Summary**

Shelter the Homeless, Inc. (STH) is a 501(c)(3) nonprofit organization that has been selected to oversee the design, construction, and operational oversight of three new Homeless Resource Centers: two in Salt Lake City and one in South Salt Lake. These Homeless Resource Centers (HRC) are part of a broader change to how our homeless service system helps individuals and families experiencing homelessness. Our goal is to minimize homelessness by making data-driven decisions, collaborating with community stakeholders, and ensuring accountability.

Each HRC will be secure, limited in accommodations (maximum 200 residents) and have essential on-site supportive services provided at each facility. By design, spacious areas are available within the center allowing clients to stay in the facility at all hours of the day and throughout the night and includes a secluded interior courtyard space for individuals to gather outdoors while staying in the center. An array of integrated wrap-around supportive services such as case management, education, job training, medical, food, storage, and housing assistance services will be conducted on-site. The HRC will be served by mobile health clinics and clients will have on-site access to a nurse manager. The goal will be to provide targeted services designed to transition individuals out of the HRC and become re-housed again as quickly as possible.

Each HRC is designed with safety in mind for residents and the surrounding neighborhood. Each HRC will provide internal (off-street) waiting/queuing areas for those seeking services. The facilities will operate as part of a region-wide coordinated entry and referral system. Multiple providers, including third party intake and assessment providers, will be contracted to provide services on-site. The facility will be designed with clear sight lines, lighting, indoor/outdoor video surveillance system, and good visibility that meets the Crime Prevention Through Environmental Design (CPTED) standards from the street and building. There will be 24/7 on-site management and security. A dedicated non-emergency hotline will be established to report any crimes, grievances, incidents, complaints, or comments. For more detailed information regarding 24-hour communication at the HRCs, see the “Complaint Response Community Relations” section.

All potential residents will be screened, assessed, and registered before acceptance at the HRC through the region-wide Coordinated Entry System. This is based on national best practices and policy to effectively address homelessness, stabilize residents with

the most need, secure permanent housing more quickly, and reduce overall demand on emergency systems.

### **Occupancy**

There are two HRC's in Salt Lake City.

1. **131 East 700 South** – At approximately 60,000 square feet, this facility will host women only. The maximum occupancy of this facility is limited to 200 and will not allow overflow.
2. **242 West Paramount Ave / 275 West High Ave** – At approximately 60,000 square feet, this facility will host both men and women. The maximum occupancy of this facility is limited to 200 and will not allow overflow.

Resource center staff and volunteers are not included in the occupancy limit of these facilities.

### **Operations**

**Hours of Operation** – Each HRC will operate 24 hours a day, 7 days a week with a full complement of qualified staff on-site. Constant monitoring of the interior and exterior of the property will be conducted. Registered residents are those persons who become eligible to receive services at the facility through the community-wide coordinated entry process. There will be a maximum of 200 registered residents at each of the Salt Lake City HRC's. Only registered residents will be permitted access into the facility during the day and through the night. Quiet hours will be enforced. Typical lights out time is from 10pm daily and all activities will cease. Lights inside the sleeping areas will come on at 6am on Monday through Friday, and 7am on Saturday and Sunday. Client intake will take place 24/7 at each facility and the necessary staff will be available during night shifts (i.e. case managers, HRC staff and managers, and security – for more information on night staff, see the "Complaint Response Community Relations Program" section). Though intake is available 24/7, registered residents are not allowed to leave the facility after quiet hours (10pm-6/7am) except for a verified work reason; HRC staff will verify this before the day of the registered resident's work shift.

**Delivery, Donations and Trash Collection Times** – Although precise delivery and trash collection times will not be available until these services are contracted, the HRC will strive to schedule these services between 8am and 6pm. Food delivery times may range from 6:00am to 6:00pm. Portable trash receptacles on the premises will be emptied

daily and other receptacles will be emptied at a minimum of once per week or as needed. Trash around the facility shall be picked up by 6am the following day.

**Noise Impacts** – Registered residents will comply with 10pm-6am week day/7am weekend quiet hours. Quiet hours will be posted around the facility and staff will reaffirm these hours. Most homeless individuals do not have cars so additional traffic noise will be minimal and, as mentioned above, most deliveries come during regular hours of operation from 9am to 5pm.

**Security** – The HRC will have on-site security during all hours when the facility is open. The facility will provide professional qualified security personnel, trained emergency responders, exterior lighting on pedestrian pathways, monitored security cameras, emergency alert systems, and parking lot areas on the property. Qualified security personnel will be hired from a private security firm. Security personnel, as required by the State of Utah, are licensed as security guards. This entails CPR, de-escalation/verbal judo, crowd control, and self-defense training. Security is permitted to carry a Taser, but not a firearm. In addition to their skill training, security personnel are required to undergo pre-assignment training and a second training after 3 months on the job. Adequate lighting will be installed for security purposes, ensuring there are no dark spots on-site or on the street. Light trespass has also been taken into consideration so there is minimal impact on neighboring properties. No criminal behavior will be tolerated on or around the property; for more information regarding criminal behavior, see the “Complaint Response Community Relations Program” section. No weapons of any kind are permitted in the HRC. Any resident with any kind of weapon in possession must relinquish it during the check-in screening process. Attempts to bring weapons into the facility will result in an immediate denial of service. Work tools and any other devices, which may be used in a manner that could cause serious bodily injury, must be checked in at the front desk and appropriately stored, before the client is allowed in other areas of the facility. Failure to relinquish these items at check-in will result in denial of services. This personal property will be returned to the resident, unless staff deems it unsafe to do so, when the resident leaves the facility. Illegal weapons of any kind identified at check-in will be turned over to the Police. Any resident found with an illegal weapon in possession within the facility will be denied services. Registered residents are not permitted to have a firearm of any kind at the facility or on the HRC premises.

**Drug and Alcohol Policies** – The HRC does not require absolute sobriety as a condition for admittance, but has strict rules of behavior, which if violated, could result in denial

of services. The HRC does not, and will not, admit persons who have consumed drugs or alcohol to the level that they are significantly intoxicated/impaired or are a danger to themselves or others. If a heavily intoxicated/impaired person shows up at the HRC, they will be denied a bed and staff will work with the denied resident to refer and transport them for appropriate services (detoxification, rehabilitation, or mental health program). If the denied resident refuses services and insists on leaving the HRC property by foot, the police will be called. If the police are called, HRC staff will attempt to maintain visual contact with the individual until the police have arrived. Extremely threatening behavior towards staff or another client will result in immediate eviction. If a client is too aggressive, angry or out of control to leave the shelter on their own, the police can be called to escort the client from the premises. No resident will be allowed to have alcohol or drugs in the HRC. Any illegal drugs turned in at check-in will be turned over to the Police. Any resident found with illegal drugs in the HRC will be denied services for at least one day. If a resident has repeated instances of inappropriate behavior that jeopardizes the safe and communal atmosphere of the facility, a resident may be given warnings; placed on daily assess or evicted; or barred for a period of time.

**Client Intake Area** – A client waiting and intake area, contained within the facility, will be provided and sufficient in size to accommodate all persons waiting to enter the facility.

**Loitering** – Registered residents loitering on the property is not allowed and will be a violation of the rules. Likewise, loitering on any private property around the facility will be a violation and may result in denial of services; length of denial will be determined on a case-by-case basis. Security stationed at the HRCs could respond to loitering off-site within specific boundaries:

- 700 S HRC – along 700 South, between State Street and 200 East.
- High Avenue HRC – along Paramount Avenue, High Avenue, and 300 West between High and Paramount Avenues.

The HRC will work closely with the local businesses and the Police Department to address any loitering issues that may arise outside of the defined boundaries above. The HRC operator will work with the neighborhood to address any loitering issues not addressed by the above policies. Camping on public or private property is illegal and all neighbors are encouraged to notify the Police if they encounter such behavior.

**Client Transportation** – Many HRC residents will come and go from the facility by public transportation or be dropped off at the main entrance by various service providers, thus reducing pedestrian and vehicular traffic. Most homeless individuals do not have cars so additional traffic noise should be minimal. Public transportation will play a large role in helping transport clients to services and work. At the 700 South HRC, the closest bus stops are located at State St. & 685 S (0.06 miles from HRC main entrance) and State St. & 720 S (0.11 miles from HRC main entrance). Both of these stops are along bus #200’s route – 685 S is northbound, and 720 S is southbound. The Library Trax station is 0.5 mile north of the 700 South HRC. At the High Avenue/Paramount HRC, the two closest bus stops are located at 300 W & 1559 S (0.13 miles from HRC main entrance) and 300 W & 1560 S (0.15 miles from the HRC main entrance). Both of these stops are along bus #9’s route – 1559 S is northbound, and 1560 S is southbound. The Ball Park Trax station is 0.58 miles north of the High Avenue/Paramount HRC.

**Parking** – On-site vehicle parking spaces will be provided. A covered and secured area for bicycle parking will be provided for use by staff and clients, commensurate with demonstrated need.

**Employee Training** – Employees housed within the facility will be required to complete a training program that includes instruction in code of guest conduct and HRC’s policies and procedures to ensure employees are qualified to fulfill their job responsibilities and to promote awareness and sensitivity to cultural backgrounds and needs.

**Neighborhood Outreach and Methods for Communication** – The STH Board of Directors supports the creation of a standing Neighborhood-HRC Coordinating Council to serve as the primary vehicle for ongoing neighborhood-shelter communications. This group may include HRC staff and representatives from the surrounding neighborhood. The purpose of this committee will be to offer recommendations to the Collective Impact on Homelessness Steering Committee and/or to the neighborhood associations on how either can become better neighbors, develop options for engaging the neighborhood in HRC activities, and, if necessary, HRC-neighborhood dispute resolution. For more detailed information on this group, see the “Complaint Response Community Relations Programs” section below.

### **Complaint Response Community Relations Program**

- 1.) There will be a representative from each HRC who will interact with and respond to neighbor's concerns or grievances. This staff person is required to have a background as a community outreach specialist or someone who has experience communicating with the public. The representative will be hired through STH. When the individual is hired, their contact information will be shared with neighborhood residents, businesses, schools, etc. Though not available at night, residents are free to contact the dedicated 24-hour response system and those concerns will be passed to the outreach representative the following morning.
- 2.) A dedicated 24-hour response system will be available for the community. Staff will be present at the HRC 24/7 to respond to emails and phone calls. Day staff will consist of approximately 40 staff including management, case managers, various service providers, HRC staff, and security. Overnight staff will have approximately 2-4 security personnel, 2-3 director/administration staff, 2-3 case managers, and 1 HRC staff member stationed at the front desk. The HRC operators will ultimately determine the number of staff working day and night shifts.
- 3.) Publicly advertised quarterly meetings with the Neighborhood-HRC Coordinating Council will be organized by either the resource center operator, STH, or the two organizations working in collaboration. Meetings will be advertised within the HRC, on the community council and operator's website and a sign posted on the public street at least ten (10) days in advance. Representatives from each of the following shall be included in the Neighborhood-HRC Coordinating Council:
  - i. A representative from the HRC;
  - ii. a business located within ¼ mile of the site;
  - iii. a resident who lives within ¼ mile of the site;
  - iv. a school, if any, within ¼ mile of the site;
  - v. chair of the community council (or designee) whose boundary encompasses the site;
  - vi. an individual who has previously received or is currently receiving services from the HRC; and
  - vii. a representative from STH.
- 4) It is the responsibility of the HRC operator to present an annual report to the Neighborhood-HRC Coordinating Council on or before February 15<sup>th</sup> each year. This document must be provided to the city-planning director as well. The annual report shall include at least the following information:
  - a) List of individuals who have participated in the community coordinating group meeting;

- b) A summary of each community coordinating group meeting;
- c) A summary of complaints received from the community by the operator of the homeless resource center; and
- d) An explanation of how complaints have been addressed/resolved.

**Dispute Resolution** – Neighbors are encouraged to notify the on-duty HRC Manager for immediate problem resolution. If the staff person cannot sufficiently resolve the problem, the complaint will be elevated, in a timely manner, to the HRC Facilities Director. If the HRC Facilities Director and the neighbor cannot come to an agreement, the issue will be elevated to the Neighborhood-HRC Coordinating Council. If the Neighborhood-HRC Coordinating Council is unable to resolve the issue, the issue may be presented to the Shelter the Homeless Executive Director. If the Shelter the Homeless Executive Director and the neighborhood representative(s) cannot amicably resolve the issue, either party may request third party mediation and/or file a grievance with the appropriate City agency.

**HRC’s Responsibility as a Good Neighbor** – As part of the HRC’s commitment to be a good neighbor, the STH Board of Directors is committed to partnering with law enforcement, local businesses, residents, and other stakeholders to address and prevent problems and be responsive to their concerns. The HRC plans to design and maintain an aesthetically pleasing land/streetscape around the facility. Each HRC is willing to participate in a “Neighborhood Watch” program and host such meetings if asked. STH Board of Directors strongly encourages the creation of a neighborhood watch program and is prepared to collaborate with the Neighborhood-HRC Coordinating Council to establish the program. In order to implement a Neighborhood Watch program, at least the following steps must be taken:

- 1) Recruit neighbors, including HRC staff.
- 2) Contact and meet with local law enforcement.
- 3) Discuss concerns and create an action plan.
- 4) Organize recurring meetings.

### **Neighborhood Impacts/Mitigation**

We understand that the addition of a HRC to any community can create perceived social anxiety and risks such as increased criminal activity, burden on the community, noise, cleanliness, decreasing property values, trespassing, increased traffic, loitering, pan-handling, and safety issues in the neighborhood and surrounding areas. We want to address each community concern regarding any perceived risks before the centers are fully operational.

Criminal behavior will not be tolerated on the property. Security can respond to off-site suspicious activity/complaints within specific boundaries:

- 700 S HRC – along 700 South, between State Street and 200 East.
- High Avenue HRC – along Paramount Avenue, High Avenue, and 300 West between High and Paramount Avenues.

If suspicious activities or complaints are reported to the HRC outside of these boundaries, security will contact and coordinate with local Police. The HRC will be a safe place for youth, staff, volunteers and community guests. As was stated in the previous section, there will be 24/7 on-site security. Staff will be on duty 24/7 and 24-hour active monitoring of the property will occur by staff and security personnel – facility/premises rounds and monitored security cameras. If at any point a neighbor, local business, or visitor feels unsafe or sees suspicious activity they can either call or email the 24/7 response center and a trained staff will respond and take the appropriate steps necessary to resolving the issue or concern.

The design/layout of the facility is meant to help clients, make the premises safe, and mitigate impacts to the neighborhood. The design of the client intake area and the scheduled day activities are both ways to mitigate loitering in the neighborhood. Each resource center has a secure inner courtyard that serves as the designated space for smoking outside in conformance with state laws.

In accordance with Chapter 9.28 of Salt Lake City code, the resource center will comply with the following:

- a) The resource center will not create unnecessary or unusually loud noises at unusual times of the day or that are a detriment to the public health, comfort, convenience, safety, welfare, prosperity, and peace of the residents of the city. This will be enforced by the operator of the resource center and through the implementation of strict quiet hours starting at 10pm and ending at 6am on weekdays or 7am on weekends.
- b) Sound levels will not exceed the standards for Salt Lake City.
- c) If a client or person associated with the resource center continuously creates or causes a noise disturbance, it is the responsibility of the resource center operator to mitigate the situation and take the appropriate steps to prevent continual noise disturbances. In addition, the specific prohibitions listed in Section 9.28.040 will not be tolerated at the resource center, except in the permitted hours of operation (i.e. waste collection between 7am and 9pm). During hours of operation, noises will not exceed the expected sound pressure level.

**Appendix D**  
**Shelter the Homeless Expectation Protocols**

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# Homeless Resource Center EXPECTATION PROTOCOLS

**Purpose:** In order to properly classify and respond to incidents occurring within our shelter facilities, the following standards have been set to guide decision making and response by facility staff. **\*Supervisor and Situational Discretion:** Supervisors are expected to exercise discretion in handling each situation based on the severity of the issue(s) and circumstances involved. Depending on the seriousness of the issues(s), steps can be repeated or omitted if the facts of the situation warrant it; there may be situations where a guest is exited or barred from a facility without progressing through the steps outlined here. Supervisors are encouraged to work with Case Managers and Human Resources to determine the proper process and response or grievance when applicable. Severe weather conditions may also result in amended responses to ensure undue harm to guests is not inflicted.

Category of Violation	Examples (Not All Inclusive)	Response
<b>Violation A:</b> <ul style="list-style-type: none"> <li>Minor, non-violent rule violation</li> <li>No police call or arrests made</li> <li>No imminent danger present</li> <li>Potentially overturned immediately by supervisors based on severity</li> </ul>	<ul style="list-style-type: none"> <li>Possession of alcohol (Expectation #2 – upholding federal/state laws)</li> <li>Unable to complete Activities of Daily Living (Expectation #3 – maintain personal hygiene)</li> <li>Accessing unauthorized area of shelter (Expectation #4 – threatening behavior towards others)</li> <li>Vandalism (Expectation #4 – threatening behavior towards the facility)</li> <li>Abusive language or behavior (non-threatening) (Expectation #4 – threatening behavior towards others)</li> </ul>	<b>First Violation:</b> <ul style="list-style-type: none"> <li>Loss of bed for night</li> <li>Or, no entry before 10 PM if warranted</li> <li>Meeting with supervisor</li> </ul> <b>Second Violation:</b> <ul style="list-style-type: none"> <li>Up to five day exit</li> </ul> <b>Third and Subsequent Violations:</b> <ul style="list-style-type: none"> <li>Up to 30 day exit</li> </ul>
<b>Violation B:</b> <ul style="list-style-type: none"> <li>Severe, non-violent rule violation</li> <li>Possible call to police for arrest</li> <li>May result in bar from facility</li> <li>Requires review by supervisor before re-entry to facility</li> </ul>	<ul style="list-style-type: none"> <li>Smoking in the building (Expectation #2 – upholding federal/state laws)</li> <li>Possession of drug paraphernalia (Expectation #2 – upholding federal/state laws)</li> <li>Possession of drugs (personal use) (Expectation #2 – upholding federal/state laws)</li> <li>Destruction of property (Expectation #2 – upholding federal/state laws)</li> <li>Possession of other weapon (Expectation #4 – threatening behavior towards others)</li> <li>Threats against staff (Expectation #4 – threatening behavior towards others)</li> <li>Stealing (Expectation #4 – threatening behavior towards others)</li> </ul>	<b>First Violation:</b> <ul style="list-style-type: none"> <li>30 day exit</li> </ul> <b>Second Violation:</b> <ul style="list-style-type: none"> <li>90 day exit</li> </ul> <b>Third and Subsequent Violations:</b> <ul style="list-style-type: none"> <li>90 day exit</li> </ul>
<b>Violation C:</b> <ul style="list-style-type: none"> <li>Severe, violent rule violation</li> <li>Required call to police for arrest</li> <li>Immediate bar from facility</li> <li>Requires review by supervisor before re-entry to facility</li> </ul>	<ul style="list-style-type: none"> <li>Possession of drugs (intent to distribute, determined by police) (Expectation #2 – upholding federal/state laws)</li> <li>Possession of firearm (Expectation #4 – threatening behavior towards others)</li> <li>Assault on other guest (Expectation #4 – threatening behavior towards others)</li> <li>Assault on staff (Expectation #4 – threatening behavior towards others)</li> <li>Use of weapon (Expectation #4 – threatening behavior towards others)</li> </ul>	<b>First Violation:</b> <ul style="list-style-type: none"> <li>Immediate exit from shelter, 1 year duration</li> <li>Trespassed from facility/agency</li> <li>Police call</li> </ul> <b>Second Violation:</b> <ul style="list-style-type: none"> <li>Open ended exit from facility/agency until reviewed by Executive Director</li> <li>Trespassed from facility</li> <li>Police call</li> </ul>

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**Appendix E**  
**Law Enforcement Best Practices**

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## Law Enforcement Best Practices Executive Summary

### Overview

The Law Enforcement Best Practices Subcommittee (LEBPS) began meeting in May 2019 to review current strategies within the homeless resource center delivery model. Local efforts and national best practice for law enforcement and homeless service providers were evaluated.

Beginning in August 2017, a multi-jurisdictional law enforcement team partnered with homeless service providers in the Rio Grande District of Salt Lake City and began working to implement a strategy to achieve safety and security. Both groups quickly recognized a critical need to find a balance of accountability and compassion for people experiencing homelessness, while maintaining consistency. Below are the group's recommendations:

### Three Prong Approach:

Law enforcement agencies should develop a multi-prong approach to addressing crime and victimization around vulnerable populations. Law enforcement agencies should assign officers who can build trust and address individual and community needs. Law enforcement agencies should develop intelligence-led units to address crime and victimization. Consistent engagement with all stakeholders builds trust and results in better outcomes.

- **Consistent/Frequent Law Enforcement Presence** – Positive and public safety guided enforcement interaction with people experiencing homelessness on a regular basis. This approach allows for officers to establish a level of accountability while maintaining and establishing a positive rapport.
- **Multi – Disciplinary Approach** - Law enforcement should engage in a co-responder model to include outreach officers and social workers. Co response provides multiple options including social services for those in need of support. If unable to dedicate full time officers, law enforcement agencies should coordinate with service providers to address unsheltered populations.
- **Crime Focused Unit** – Includes narcotics and criminal enforcement units focusing on those who are distributing drugs and preying on the vulnerable population. Utilizes intelligence led policing and data to identify criminals and enhance public safety.

### Aligning the Criminal Justice System:

- Coordination with local courts and prosecutors to develop diversion programs and opportunities, and ensure fair and accessible opportunities to address legal challenges.
- Consistent approach throughout the judicial system, and across jurisdictions, to ensure equal treatment opportunities and sentencing.

### Referral to Services:

- Law enforcement will develop easily accessible information on homeless services available 24 hours a day. This would include information on how to connect a citizen to shelter services and provide resources to divert from jail when necessary.

**Data Sharing:**

- Law enforcement, service providers, and municipalities will develop a clear and consistent way to share information.
- Law enforcement agencies will develop clear access to shelter availability information.

**Coordinated Meeting:**

- Consistently hold meetings between law enforcement, service providers, private security, and other stakeholders to have a clear understanding of current events, high utilizers, and a team-oriented approach to solving challenges.

**Coordinated Training:**

- Cross training for both law enforcement and service providers to have an understanding of available resources, techniques, and goals.

## Law Enforcement Best Practices

The Resource Center Transition Team (RCTT) tasked the Public Safety Task Group (PSTG) to identify best practices on engagement between law enforcement agencies, homeless service providers, and people experiencing homelessness in the community.

The multidisciplinary group consists of the following agencies: Catholic Community Services, Department of Workforce Services, Downtown Alliance, Kane Security, The Road Home, Salt Lake City Police Department, Salt Lake City Mayor's Office, Salt Lake County Mayor's Office, Salt Lake County Sheriff's Office, Shelter the Homeless, South Salt Lake Police Department, Unified Police Department, Utah Department of Public Safety, Volunteers of America, and West Valley City Police Department.

The LEBPS began meeting in May 2019, reviewing practices within the current homeless resource center delivery model, local tools, and national best practices for law enforcement and homeless service providers. Recognizing that no one system can effectively address this problem alone, law enforcement and homelessness service system leaders are partnering to understand the scope of homelessness in their communities and are beginning to develop coordinated strategies for responds.

Beginning in August 2017, a multi-jurisdictional law enforcement team and homeless service providers in downtown Salt Lake City area began to work together to implement a strategy to provide safety and security for all. This strategy included creating a balance between accountability and compassion for people experiencing homelessness. A three-pronged approach was created which focused on constant and consistent law enforcement presence, co respond outreach teams, and a crime focused unit that utilizes information and data to respond to specific areas and individuals that are public safety concerns.

Each of these strategies are designed to support law enforcement in upholding the laws and safety of the community while partnering with homeless service providers to provide a problem solving approach to reduce involvement with the criminal justice system while simultaneously making homelessness brief, rare, and non-recurring. The recommendations are as follows:

### **Three Prong Approach:**

One of the most valuable components identified is consistency related to law enforcement engagement with the homeless population. Law enforcement collaboration with homeless service providers and social workers must also be consistent to ensure positive outcomes for those experiencing homelessness. This multidisciplinary approach affords the opportunity for teams to work in tandem with people experiencing homeless. Law enforcement agencies, local government, and service providers will collectively improve public safety and provide services specific to each individual. The three prong approach includes:

- **Consistent/Frequent Law Enforcement Presence** – Law enforcement agencies should proactively engage in consistent and positive interaction with people experiencing homelessness. Providing the same patrol officers in an area on a consistent and frequent

basis allows officers to know the community, build trust, establish a level of accountability, and utilize informed discretion when taking enforcement actions. It is critical for law enforcement personnel to build relationships with the community, specifically those experiencing homelessness. If unable to provide consistent officers, law enforcement agencies should develop procedures to collaborate with service providers, and share important data to include information related to current trends.

- **Multi – Disciplinary Approach** - Law Enforcement should engage in a co-responder model to include outreach officers and social workers. This allows law enforcement to offer multiple avenues, including social services, to those in need.
- **Crime Focused Unit** – Law enforcement agencies should deploy specialized narcotics/enforcement personnel to focus on those who are preying on the vulnerable population. These criminal actors create barriers for people attempting to access services. Crime focused units utilize intelligence led policing and data to identify, investigate, and apprehend the most dangerous criminal actors in our community and enhance overall public safety. Intelligence led policing efforts also identify repeat offenders and potential victims. This allows law enforcement to collaborate with the community, service providers, legal defenders, and prosecutors to provide specific solutions based on individuals behaviors and circumstances. Most importantly, it assists law enforcement agencies and provider to prevent further victimization.

### **Aligning the Criminal Justice System:**

Law enforcement, service providers, and other stakeholders should examine how laws and ordinances affect the criminal justice systems and those experiencing homelessness. People who are involved in the criminal justice system are more likely to spend 50% more time accessing homeless services than someone who is not. This highlights the need for a strong law enforcement, judicial, and service provider partnership.

- Law enforcement agencies should coordinate with local courts and prosecutors to ensure fair and accessible opportunities to address legal issues. Within the new homeless services shelter system there are three cities that may have an increase in criminal charges involving those who are homeless.
- Professional should implement a consistent approach throughout the judicial system, and across jurisdictions, to ensure equal treatment opportunities and sentencing. This approach includes coordination with the Legal Defender’s Association and other pro-bono services that support homeless individuals.
- Law enforcement agencies should encourage diversion programs or other innovative approaches to reduce criminal justice involvement. This allows individuals to better access services, jobs, and housing. Law enforcement agencies should participate and advocate for such programs.

- Law enforcement agencies should clearly define roles on multi-disciplinary teams that include law enforcement outreach and social workers to ensure effective delivery of services and support.

### **Referral to Services:**

- Law enforcement will develop accessible information on homeless services available 24 hours a day. This would include resources to connect a community member to shelter services and provide resources to divert from jail when necessary.
- Law enforcement agencies should clearly define processes for all officers who are engaging and referring people experiencing homelessness. Agencies should also provide officers information related to capability and availability of all service providers.
- Law enforcement officers should have access to information related to availability of transportation resources to connect individuals to resource centers throughout the valley.

### **Data Sharing:**

Law enforcement agencies and homeless service providers need data to identify the scope and needs of their shared homeless population. Data allows entities to understand the population's needs. Shared data between the law enforcement agencies and homeless services systems provide an all-inclusive view, which can facilitate a more complete outcome for those experiencing homelessness. This analysis also helps agencies understand the size of the shared population and frequency of contacts with both systems.

It also helps establish a baseline number of calls and arrests for this shared population against which to measure progress over time. Data matching can allow both systems to identify a subset of people experiencing homelessness who have high levels of repeat encounters with law enforcement. These individuals can be identified for outreach and engagement in services to prevent further contact with law enforcement. Data should be shared in a manner consistent with law while protecting the confidentiality and dignity of individuals.

- Law enforcement, service agencies, and municipalities should have a clear and consistent way to share identifiable information in order to provide wrap around services to each individual. This will increase public safety throughout out the state by identifying the criminal element who prey on the homeless.
- A shared anonymized database should be established. This will allow providers from different disciplines and jurisdictions to access information related to sub-group homeless activity throughout our state. This information would help identify trends and inform service delivery. The dashboard data would come from a variety of agencies including law enforcement, non-profit service providers, and individual municipal entities.
- Law enforcement agencies should have clear access to up-to-date shelter availability.

## **Coordinated Meeting:**

Regularly held meeting will be established between law enforcement, service providers, private security, and other stakeholders to have a clear understanding of current events, high utilizers, and a team-oriented approach to solving challenges. An effective, collaborative, and community-wide response to homelessness first requires that leaders in both law enforcement and the homelessness services system understand the importance and roles both systems play in addressing their common goals.

A critical element of this work is defining the most effective and appropriate roles for the partners involved, with decisions focused on what works best for helping to link people experiencing homelessness to lasting solutions in each jurisdiction. Key staff from each of the critical stakeholders will engage on a regular basis and ensure the staff identified are the appropriate level of leadership and decision making authority.

In order for the task force to run successfully there will need to be a group of key stakeholders who are continually engaged on a regular basis to oversee and implement change on a system wide level. Those stakeholders are identified as follows:

- Homeless Service Providers
- Law Enforcement Agencies
- Treatment Services
- Private Security
- Incarceration Services
- Health Care Providers
- Local Health Department
- Behavioral Health Services
- Political leadership
- People experiencing homelessness
- Other identified stakeholders

Below is a list of roles that play a key part in best practices:

- Law Enforcement Agencies – Dedicated teams that focus on the homeless population with the role of supporting and providing resources while maintaining order and safety for clients and the community. This approach is different from a traditional law enforcement approach, focusing on outreach and supportive services within the criminal justice system and homeless services arena. This approach is more hands-on and uses a multi-disciplinary approach, which includes social workers and supports individuals with diversion from the criminal justice system and in exiting homelessness.
- Homeless Service Providers – Providers that offer emergency shelter services, day services, outreach services, and engage with homeless individuals on a regular basis with an end goal of housing. Homeless service providers work in tandem with law enforcement to provide wrap-around services for those most in need in the community.

- Substance-use Treatment – Provide treatment services for people experiencing substance use. Residential housing options are available for those in active recovery. Engagement with emergency shelters to assist guests in treatment.
- Emergency Shelter Private Security – Assist emergency shelter providers with rule compliance and minimize criminal activity entering the shelter. Private security addresses situations within the shelter that do not require law enforcement engagement.
- Incarceration Services – Provides services and resources to people who are homeless and enter into the jail system. This also includes legal defenders.
- Health Care Providers – Provide access to emergent medical care as well as primary care services for those experiencing homelessness.
- Behavioral Health Services – Provide both crisis and long-term services for people experiencing mental health challenges in addition to homelessness

### **Coordinated Training:**

Training is an opportunity to familiarize officers with available crisis responses, diversion options, long-term services, and housing, as well as the criteria for those services and programs and relevant local contacts.

In addition to these general subject areas, training may cover various sub-populations of people experiencing homelessness, including women and unaccompanied youth, and protocols for responding to these groups. Written protocols are effective when paired with basic training for all officers on mental illnesses, substance use disorders, homelessness, and de-escalation techniques.

- Cross training for both law enforcement and service providers to have an understanding of available resources, techniques, and goals.

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## **Agency Responses**

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## **Office of Homeless Services**

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**State of Utah**

**SPENCER J. COX**  
*Governor*

**DEIDRE  
HENDERSON**  
*Lieutenant Governor*

**Office of Homeless Services**

**WAYNE NIEDERHAUSER**  
*Homelessness Coordinator*

**TRICIA DAVIS**  
*Assistant Director*

May 8, 2021

Mr. Kade R. Minchey CIA, CFE, Auditor General  
Office of the Legislative Auditor General Utah State Capitol Complex  
Rebecca Lockhart House Building, Suite W315  
P.O. Box 145315  
Salt Lake City, UT 84114-5315

RE: Report No. 2021-07

Dear Mr. Minchey:

Thank you for the opportunity to respond to the audit entitled, "A Follow-up Audit of the Safety and Security Within Local Homeless Resource Centers".

We recognize the efforts of the Office of the Legislative Auditor General and appreciate the professional manner in which the auditors' conducted the review of safety and security at the homeless resource centers. The State Office of Homeless Services does not own or operate homeless resource centers, but does maintain funded contracts intended to assist individuals in need of emergency shelter.

It is pleasing to learn that the auditors found improvement in safety and security at the resources centers and agree that this area requires continuous evaluation to ensure that best practices are implemented. We also appreciate the auditors' work identifying barriers individuals seeking these services experience and the need to enhance services designed to help individuals overcome these barriers.

As an Office, we are committed to continued work with local law enforcement agencies, Shelter the Homeless, The Road Home, and Volunteers of America to assist individuals experiencing homelessness and finding solutions which create the best opportunity to make homelessness rare, brief and nonrecurring.

Should you have any further questions or concerns, please do not hesitate to contact me directly.

Sincerely,

Wayne Niederhauser  
State Homeless Services Coordinator

Office of the Utah Legislative Auditor General

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**Shelter the Homeless  
Volunteers of America  
The Road Home**

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**Follow-up Audit of the Safety and Security of Local Homeless Resource Centers May 2021**  
**HRC Audit Responses, May 10, 2021**  
**Shelter the Homeless, Volunteers of America Utah, and The Road Home**



On behalf of the Homeless Resource Center system, we are pleased to address the recommendations in the *2021 Follow-up Audit of the Safety and Security Within Local Homeless Resource Centers*. We appreciate the auditor’s thoroughness and determination to approach the process with cooperation and transparency throughout the audit. The primary goal of the Homeless Resource Centers (HRCs), which launched in mid-2019, is to support our system-level goal to make homelessness rare, brief, and non-recurring by providing emergency shelter coupled with onsite services and case management to help those experiencing homelessness resolve their immediate crisis and rapidly return to stable housing. This work is best done in a safe, secure and healthy environment, and the system is operating with a high level of collaboration and partnerships, which has led to consistent and cohesive systems that are working. Thank you for your time and attentiveness.

We recognize that it is time to evaluate the policies and procedures that govern our work and will commence this overall evaluation along with the responses to the audit recommendations listed below.

### **Chapter III**

#### **Opportunities Exist for Resource Centers to Further Reduce Criminal Activity**

##### Recommendations

1. We recommend that Shelter the Homeless consider deploying K9 units at resource centers and that they be used throughout the facilities and that their visits be done at random and unannounced times.
  - Shelter the Homeless (STH) will engage with local police departments and the resource center operators to craft and implement a plan around deployment of K9 units in each of the HRCs that is consistent with the recommendation. Documentation of the dates, times and results of K-9 deployments will be kept by Shelter the Homeless.
2. We recommend that Shelter the Homeless consider whether current staffing levels are adequate to effectively monitor HRC residents.
  - STH will collaborate with the resource center operators concerning staffing levels to best meet the needs of the HRC residents and effectively address the challenges that arise. Optimal staffing levels will be determined during annual budgeting cycles and implemented to the extent that funding allows, with the minimum staffing level being that which is required by the State licensing requirements.
3. We recommend that Shelter the Homeless provide the resource center operators with clear guidance for responding to violations of resource center policies.
  - STH will collaborate with the operators of the resource centers to review the Public Safety Task Group best practices recommendations for safety and security policy for the HRCs to guide training and updates to improve consistency. This will be implemented by September 2021.

- STH will collaborate with the resource center operators to review and refine the HRC Policies and Procedures, Safety and Security policy section entitled Expectation Protocols. The goal is to ensure the response to violations reflects what is realistic and reasonable based on the experience gained in operating the system, follows best practices, and is supported by the "Supervisor and Situational Discretion" section in the headline of the Expectation Protocols, which encourages discretion/judgment calls based on current conditions in and around the HRCs, and circumstances of the individual, including personal vulnerability. The HRC Policies and Procedures, which provide structure in addressing criminal activity, will be re-assessed by November 2021.

## **Chapter IV**

### Resource Centers Require Support From Public and Non-profit Partners

#### Recommendations

1. We recommend that homeless resource center operators work with their respective cities to improve law enforcement efforts to use a frequent, consistent, and positive approach when engaging with the homeless community.
  - STH and the HRC operators will utilize the regularly scheduled meetings with respective cities to share best practices such as Trauma Informed Care and Motivational Interviewing to support law enforcement's efforts to engage with the homeless community.
2. We recommend that homeless resource centers improve information sharing with local law enforcement by submitting a monthly criminal activity report to the local police department and to the board of trustees for Shelter the Homeless.
  - STH intends to support the resource center operators, the local police departments, and private security and will produce a cohesive, monthly HRC System Safety report to share with staff, the local police departments, and the board of trustees for Shelter the Homeless. The HRC System Safety report will be developed and implemented by December 2021.
3. We recommend that homeless resource centers improve the manner in which information is shared with local law enforcement by formalizing the reporting of individual criminal activity.
  - STH and the HRC operators will discuss options with local law enforcement and clarify expectations regarding protocols for reporting individual criminal activity within the resource centers. Protocols will be updated as needed. Conditional use permits will be reviewed to ensure compliance with city expectations.
4. We recommend that homeless resource centers continue to improve coordination meetings to ensure the needs of specific individuals who are high utilizers or high-risk guests of the resource centers are discussed.
  - A standard agenda will be created for coordination meetings that include the review of high-risk guests, so that law enforcement is more aware of the specific concerns and behaviors of high risk guests that the HRCs may request assistance with. This standardized agenda will be put into place by July 2021.

Laurie Hopkins, Executive Director, Shelter the Homeless

Kathy Bray, Chief Executive Officer, Volunteers of America, Utah

Michelle Flynn, Executive Director, The Road Home