



Report to the Committee on Homeland
Security and Governmental Affairs,
U.S. Senate

September 2014

FEDERAL REAL PROPERTY

More Useful Information to Providers Could Improve the Homeless Assistance Program

GAO Highlights

Highlights of [GAO-14-739](#), a report to the Committee on Homeland Security and Governmental Affairs, U.S. Senate

Why GAO Did This Study

Title V of the McKinney-Vento Homeless Assistance Act enacted in 1987 created a program to assist the homeless, in part, by identifying unused federal real property and making it available to homeless assistance providers.

GAO was asked to review the implementation of Title V of the McKinney-Vento Homeless Assistance Act. This report examines: (1) the identification and transfer of federal real property to homeless assistance providers and (2) the benefits and challenges homeless assistance providers and national advocacy organizations reported in identifying, acquiring, and using federal real property, and the potential actions that could help to address these challenges. GAO obtained information and data from HUD and the Department of Health and Human Services (HHS) on the properties reported since the program's inception and interviewed officials from GSA, HHS, and HUD. GAO also obtained views on the program from officials at (1) nine federal agencies, representing a range of size in their real property portfolios; (2) eleven homeless assistance providers (including eight that received property), representing a range of locations, size of property, and services provided; and (3) national homeless-advocacy organizations.

What GAO Recommends

Congress should consider changing (1) the scope of properties to be reported to HUD with respect to the types of properties that may be less likely to be useful to assist the homeless and (2) the frequency of *Federal Register* reporting.

View [GAO-14-739](#). For more information, contact David J. Wise at (202) 512-2834 or wised@gao.gov.

September 2014

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More Useful Information to Providers Could Improve the Homeless Assistance Program

What GAO Found

Since inception in 1987, the nationwide Title V homeless-assistance program has transferred 122 properties from federal agencies to homeless assistance providers. Of these properties, 81 are currently being used to provide a range of homeless assistance services nationwide. Such services include transitional housing, referral services, and emergency shelter. However, few of the properties that the Department of Housing and Urban Development (HUD) has listed as suitable and available since the program's inception received applications from homeless assistance providers. In most cases, the properties may not have actually been practical for homeless service providers to use. For example, in 2013 about 80 percent of these properties were for off-site use only—meaning that a provider would need to physically move the property in order to use it. HUD officials told us that they would prefer that agencies not be required to report certain types of properties at all, such as those for off-site use only. The current statutory requirement for agencies to report all properties that fall within four broad categories—excess, surplus, underutilized, and unutilized—may not be effective for certain types of properties. Such exclusion could allow HUD officials to focus on the suitable and available properties that may be more likely to assist the homeless.

Of the 11 homeless assistance providers we interviewed, the eight case study providers that acquired property cited benefits from the Title V homeless assistance program, such as expanding services and obtaining real property at no cost. These benefits notwithstanding, the providers identified challenges, such as identifying available properties. These findings are consistent with reports from national homeless advocacy organizations. HUD reports properties in the *Federal Register* multiple times a year as required. The United States Interagency Council on Homelessness (USICH), which plays a coordination role, provides a link on its website to the HUD reports. Nonetheless, according to national homeless advocates, many homeless assistance providers remain unaware of the availability of properties because the *Federal Register* is not user-friendly. Further, HUD lists many of the same properties more than once in the *Federal Register*, as required, even though they may not be useful to homeless assistance providers. In the past, some in Congress and the executive branch have raised issues about reporting requirements; the basic issue has been that some requirements result in reports that may be burdensome to produce, or not very useful. Modifying reporting requirements to reduce the frequency of reporting related to properties that are less likely to be useful to homeless providers could help, while also allowing HUD to continue to fulfill its responsibilities.

Contents

Letter		1
	Background	4
	122 Properties Transferred Have Provided a Range of Homeless Assistance Services, but Many Properties Reported and Deemed Suitable for Homeless Assistance May Not Be Useful for That Purpose	11
	Homeless Assistance Providers Expanded Services, but Some Reported Encountering Challenges in Identifying, Applying for, and Using Real Property	24
	Conclusion	33
	Matter for Congressional Consideration	34
	Recommendations for Executive Action	34
	Agency Comments and Our Evaluation	35
Appendix I	Scope and Methodology	39
Appendix II	Sample Title V Checklist Submitted by Landholding Agencies to HUD	43
Appendix III	List of Landholding Agencies HUD Canvasses for Title V	48
Appendix IV	Services Provided at 81 Active Properties Transferred under Title V, by State	49
Appendix V	Eight Homeless Assistance Case-Study Properties	57
Appendix VI	Comments from the General Services Administration	65
Appendix VII	Comments from the Department of Health and Human Services	67

Appendix VIII	Comments from the U.S. Interagency Council on Homelessness	69
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Appendix IX	GAO Contact and Staff Acknowledgments	70
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Tables

Table 1: Categories of Real Property That Landholding Agencies Must Report to the Department of Housing and Urban Development (HUD)	6
Table 2: Types of Homeless Assistance Services Offered at the 81 Active Properties, as of March 31, 2014	14
Table 3: Examples of Suitable and Available Properties in 2013 That May Not be Practical for Homeless Assistance Use	17
Table 4: Number of Properties HUD Reported Suitable and Available for “Off-site Use Only”	18
Table 5: Department of Housing and Urban Development’s (HUD) <i>Federal Register</i> Reporting Requirements	27
Table 6: Services Provided at 81 Active Properties Transferred under Title V, by State	49

Figures

Figure 1: The Title V Homeless Assistance Program Process	5
Figure 2: Geographic Distribution of 81 Currently Active Properties as of March 31, 2014	13
Figure 3: Estimated Number of Properties Potentially Available for Homeless Assistance Compared to the Total Number of Properties Transferred under the Title V Homeless Assistance Program, 1987–2014	15
Figure 4: Former Social Security Administration Building	57
Figure 5: Former Lowry Air Force Base Building	58
Figure 6: Former Homestead Air Force Base	59
Figure 7: Former U.S. Coast Guard Family-Housing Site	60
Figure 8: Former Social Security Administration Building	61
Figure 9: Former Sonstelie Hall Army Reserve Center	62
Figure 10: Former Naval Reserve Center	63
Figure 11: Former U.S. Coast Guard Housing	64

Abbreviations

ARCH	A Regional Coalition for Housing
BRAC	Base Realignment and Closure Act
DOD	Department of Defense
DOE	Department of Energy
DOI	Department of the Interior
EPA	Environmental Protection Agency
GSA	General Services Administration
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
LRA	local redevelopment authority
OMB	Office of Management and Budget
NLEC	New Life Evangelistic Center
OneCPD	Community Planning and Development Web site
USICH	U.S. Interagency Council on Homelessness
VA	Department of Veterans Affairs
VOALA	Volunteers of America of Los Angeles

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September 30, 2014

The Honorable Thomas R. Carper
Chairman
The Honorable Tom Coburn, M.D.
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

Estimates of the homeless population in the United States vary widely. According to the Department of Housing and Urban Development (HUD) 610,042 people in the United States were homeless on a single night in January 2013, and more than a third of these people were living in unsheltered locations, such as under bridges, in cars, or in abandoned buildings.¹ According to the National Law Center on Homelessness and Poverty, the numbers of Americans experiencing homelessness is estimated between 1.5 million to 3.5 million in a given year.² At the same time, we have previously reported that federal agencies continue to hold thousands of unneeded and underutilized properties that annually cost the government over a billion dollars to operate.³ As a result of this and other long-standing problems, we have designated federal real property as a high-risk area.⁴ Title V of the McKinney-Vento Homeless Assistance Act (the Act), as amended, created a program to assist the homeless, in part, by using public resources and programs—including unused federal

¹ U.S. Department of Housing and Urban Development, *The 2013 Annual Homeless Assessment Report (AHAR) to Congress*, (Washington, D.C.: 2013). Of the 610,042, 394,698 people were homeless in sheltered locations and 215,344 were living in unsheltered locations.

² National Law Center on Homelessness and Poverty. *This Land Is Your Land: How Surplus Federal Property Can Prevent and End Homelessness* (Washington, D.C.: October 2013).

³ GAO, *Federal Real Property: The Government Faces Challenges to Disposing of Unneeded Buildings*. [GAO-11-370T](#) (Washington, D.C.: Feb. 10, 2011).

⁴ GAO, *High Risk Series: An Update*. [GAO-13-283](#) (Washington, D.C.: February 2013).

real property—in a more coordinated manner to meet the needs of homeless Americans.⁵

In general, Title V of the Act requires federal landholding agencies to identify and make available for homeless assistance real property under their control that they are not fully utilizing or no longer need before properties are disposed through other means. If a property is published by HUD as suitable and available, eligible applicants, such as homeless assistance providers and local governments, may apply to obtain the real property at no cost for the provision of a broad range of services for the homeless, including shelter, job training, and storage.

However, implementing the Title V homeless assistance program requirements has presented challenges. Our prior work has found that legal and budgetary challenges continue to hamper agencies' disposal efforts. Since much of the unneeded federal real property may have no remaining useful life, may require extensive environmental remediation, may be located within secure compounds, or require off-site removal, it, for example, may not be useful to assist the homeless.⁶ You asked us to determine how this program is performing both in terms of government operations and for homeless assistance providers. This report addresses two objectives:

1. The identification and transfer of federal real properties for homeless assistance under the Title V homeless assistance program.
2. The benefits and challenges homeless assistance providers and national advocacy organizations reported in identifying, acquiring, and using federal real property, and potential actions that could help address these challenges.

To determine what is known about the identification and transfer of federal real properties for homeless assistance under Title V, we reviewed the requirements of Title V of the Act as they apply to the

⁵ Pub. L. No. 100-77, 101 Stat. 482 (1987). The Stewart B. McKinney Homeless Assistance Act, enacted in 1987, was renamed the McKinney-Vento Homeless Assistance Act in October 2000 by Pub. L. No. 106-400, 114 Stat. 1675 (2000). For the purposes of this report, we will refer to this program as the Title V homeless assistance program.

⁶ GAO, *Federal Real Property: Progress Made Toward Addressing Problems, but Underlying Obstacles Continue to Hamper Reform*, [GAO-07-349](#) (Washington, D.C.: Apr. 13, 2007).

General Services Administration (GSA), the Department of Health and Human Services (HHS), HUD, and the U.S. Interagency Council on Homelessness (USICH). We obtained estimates from HUD of the number of underutilized, unutilized, excess, and surplus properties reported by landholding agencies and the number that HUD determined to be suitable and published as available for homeless use since the program's inception in 1987 through March 31, 2014—the date of the most recently available information. To assess the reliability of these estimates, we interviewed officials from HUD about how the estimates were derived and determined that the information provided by the agency provides a reasonable basis, with caveats, for reporting the number of properties that have been screened and found suitable and available. In addition, to determine the types of properties reported, we analyzed HUD's annual reports of suitable/available and suitable/unavailable properties for years 2008 through 2013. This time frame was selected to include the 5 years prior to this audit. When HUD's annual report for 2013 became available, we added it to the analysis to include the most recent information. From HHS, we also obtained documents and data on the number of notices of interest and applications it received for properties made available for homeless assistance from the program's inception in 1987 through March 31, 2014. To assess the reliability of these data, we interviewed officials from HHS about how the data are collected and maintained, and the importance to the agency of ensuring the completeness of this data, and we determined that the data were sufficiently reliable for the purposes of our report. To understand how federal landholding agencies identify and report real property to HUD pursuant to the Act's requirements, we selected nine landholding agencies to include a range of size among real property portfolios of land and buildings, including GSA, HHS, the three Department of Defense service branches—the U.S. Army, U.S. Air Force, and U.S. Navy—the Department of Energy (DOE), the Department of the Interior (DOI) and the Department of Veterans Affairs (VA),⁷ and the Environmental Protection Agency (EPA).⁸ We interviewed agency officials from GSA, HHS, HUD, and USICH to understand how they process properties reported under Title V homeless assistance program

⁷ After preliminary audit work, we did not continue our work at VA because we learned that very little of VA's property becomes available for Title V purposes.

⁸ Altogether, GSA, HHS, and the other seven landholding agencies we reviewed account for almost 90 percent of real property held by the federal government in 2012. According to HUD officials, HUD is not a landholding agency.

requirements. We also interviewed agency officials from the nine landholding agencies to obtain their views on how they meet the Act's requirements and their impact on each agency's disposal process. To determine the benefits and challenges that homeless assistance providers and national advocacy organizations report in identifying, acquiring, and using federal real property and potential actions that could help address those challenges, we selected eight homeless assistance organizations that acquired federal real property under the program based on criteria such as the size of the real property acquired under the program, the services provided, geographic distribution, range of experiences, and suggestions from agencies and homeless advocacy organizations. We interviewed representatives from each of the selected organizations, reviewed documentation, and conducted site visits to two properties transferred under the Title V homeless assistance program. We also convened a virtual discussion panel comprised of representatives from three homeless assistance organizations whose applications for federal real property were not approved and interviewed representatives from two national homelessness-advocacy organizations (see app. 1 for more information on our scope and methodology).⁹ We conducted this performance audit from September 2013 to September 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

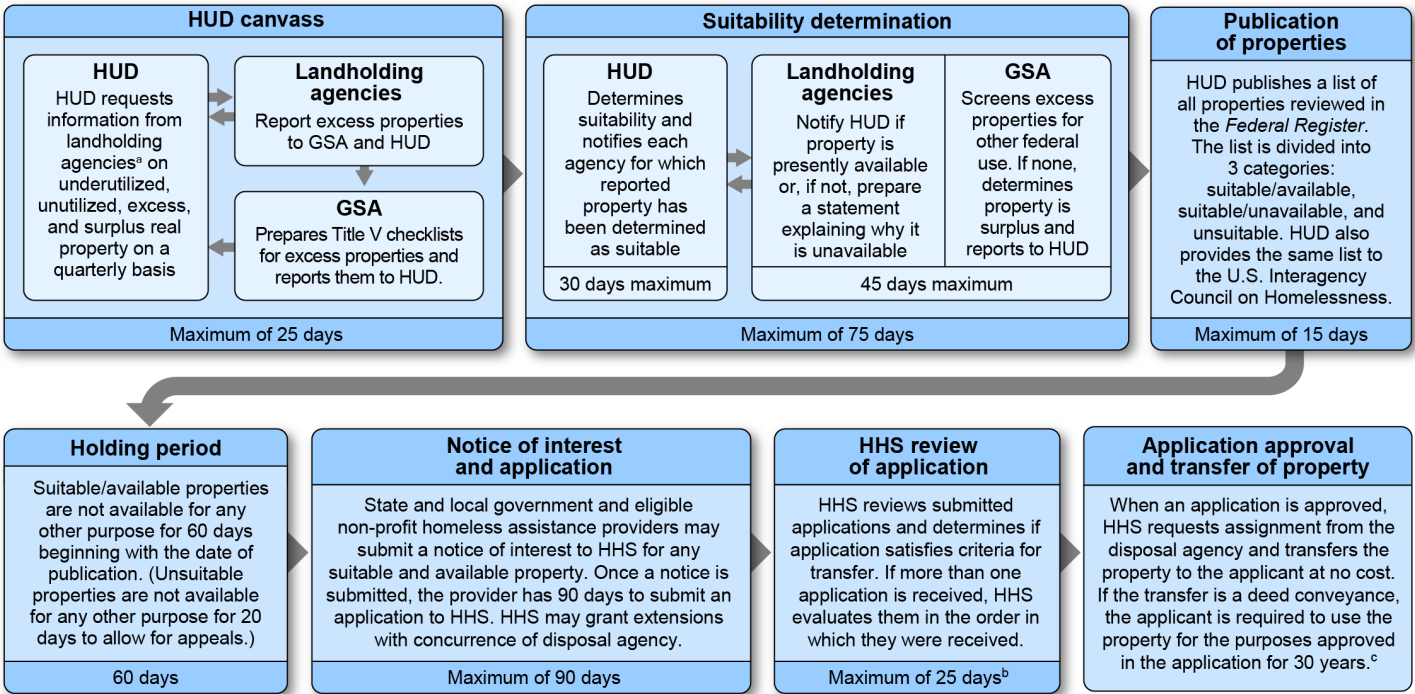
Background

The McKinney-Vento Homeless Assistance Act created over a dozen programs intended to comprehensively address the needs of homeless Americans. Among these, the Title V homeless assistance program requires federal landholding agencies to make available real property that they identify as excess, surplus, unutilized, or underutilized for possible use to assist the homeless. Title V of the Act designated GSA, HHS, and HUD to administer the program. In addition, Title II of the Act created what is now known as USICH, an independent establishment within the Executive Branch whose mission is to coordinate the federal response to

⁹ The national advocacy organizations were the National Coalition for the Homeless and the National Law Center on Homelessness and Poverty.

homelessness. The mission of USICH is to create a national partnership to act as a coordinating body between the federal government and the private sector to end homelessness nationally. Title V specifies a number of steps that federal landholding agencies, the three federal agency administrators of the program, and USICH must take to make federal real property—including land and buildings, or both—available for homeless assistance. Figure 1 summarizes key steps in the process and the time frames required to perform those steps.

Figure 1: The Title V Homeless Assistance Program Process



Abbreviations:
 HUD: Department of Housing and Urban Development
 GSA: General Services Administration
 HHS: Department of Health and Human Services
 Sources: GAO analysis of HUD, GSA, and HHS information. | GAO-14-739

^a Some agencies (e.g. DOI and the U.S. Navy) submit Title V checklists on an ongoing basis during the interim between the quarterly canvasses.
^b HHS has a maximum of 25 days from the date a completed application is received to evaluate the application.
^c HHS has a process by which the approved program of use may be changed as needed.

HUD canvass: HUD surveys the landholding agencies that must identify and report to HUD on a quarterly basis real property that is excess, surplus, underutilized, or unutilized (see table 1).¹⁰

Table 1: Categories of Real Property That Landholding Agencies Must Report to the Department of Housing and Urban Development (HUD)

Property category	Description	Where defined
Excess property	Property that an agency has determined is not required to meet the agency's needs or responsibilities.	42 U.S.C. § 11411(i)(2) which incorporates by reference 40 U.S.C. § 102(3).
Surplus property	An excess property that GSA has determined is not required to meet the needs or responsibilities of all federal agencies.	42 U.S.C. § 11411(i)(2) which incorporates by reference 40 U.S.C. § 102(10).
Underutilized property	Property used only irregularly, intermittently, or partially for current agency mission needs.	Implementing regulations promulgated by HUD, GSA, and HHS (24 C.F.R. § 581.1; 45 C.F.R. § 12a.1; 41 C.F.R. § 102-75.1160).
Unutilized property	Property not occupied for current program purposes.	Implementing regulations promulgated by HUD, GSA, and HHS (24 C.F.R. § 581.1; 45 C.F.R. § 12a.1; 41 C.F.R. § 102-75.1160).

Source: GAO analysis. | GAO-14-739

Once landholding agencies (currently 25 in total) receive HUD's quarterly canvassing letter, they have 25 days to respond. To collect such information, HUD asks landholding agencies to complete a "Title V checklist" for each of the excess, surplus, underutilized, or unutilized properties that they have identified and are required to report.¹¹ The checklist is a HUD document that requires the landholding agency to provide a variety of summary information about the real property, including its utilization status, accessibility (e.g., in a remote location or behind a secure perimeter), environmental condition, agency contacts, and other information (see app. II for an example of this checklist).

Suitability determination: HUD assigns each reported real property a unique identification number and enters the checklist information into an electronic database. Based on the checklist, HUD must determine the suitability of each real property for homeless assistance. According to implementing regulations, all real property—land, buildings, or both—are

¹⁰ A "landholding agency" is a federal department or agency with the statutory authority to control real property. 42 U.S.C. § 11411(i)(3).

¹¹ See app. III for a list of the 25 landholding agencies HUD currently canvasses.

suitable unless a property's characteristics include one or more of the following conditions:

- national security concerns, meaning a property is located in an area where the general public is denied access in the interest of national security;
- flammable or explosive materials within 2000 feet of the property;
- located in an airport runway clear zone or military airfield clear zone;
- located in a floodway;
- documented deficiencies, meaning a property with a documented and extensive condition(s) that represents a clear threat to personal physical safety, including structural damage or certain types of environmental contamination; or
- inaccessible, meaning a property is not accessible by road.¹²

After HUD makes a suitability determination, it is to provide this information to the reporting landholding agencies for review, as well as for the *Federal Register* listing that briefly describes the property's condition and status (e.g., underutilized, unutilized, excess, or surplus).¹³

Landholding agencies then have 45 days to make any edits, as noted in figure 1, such as changes in the property's status. In addition, landholding agencies must transmit to HUD a statement of the availability of real property, declaring for example that a property is available for homeless assistance or explaining why a property cannot be made available for homeless assistance, such as in the case of a further compelling federal need for the property.

HUD also communicates with GSA, the federal government's real-property disposal agent, to identify excess real properties that landholding agencies have reported to GSA for disposal. If, however, a landholding agency reports real property to GSA that has not been submitted to HUD for a Title V suitability determination, GSA is required to create a Title V checklist and forward it to HUD.¹⁴

Publication of properties and holding period: Title V requires HUD to publish in the *Federal Register* all properties it reviewed. HUD's *Federal*

¹² 24 C.F.R. § 581.6 (a); 41 C.F.R. § 102-75.1185(a); 45 C.F.R. § 12a.6(a).

¹³ 42 U.S.C § 11411(b), (c).

¹⁴ 24 C.F.R. § 581.5(c); 41 C.F.R. § 102-75.1180(c); 45 C.F.R. § 12a.5(c).

Register listings typically classify these properties as: 1) suitable and available for homeless assistance; 2) suitable but unavailable for homeless assistance; or 3) unsuitable for homeless assistance. Once published, homeless assistance providers—including state and local governments or eligible private non-profit organizations¹⁵—have 60 days to submit a “notice of interest” for suitable and available properties, and then 90 days from the date of the “notice of interest,” to submit an application to HHS.¹⁶ The real property is not available for any other purpose during the 60-day or 90-day period or during the period in which HHS reviews the application. Interested parties also have 20 days to challenge the suitability determination of real property HUD found unsuitable for homeless assistance. If a notice of interest is not filed for a suitable and available real property within 60 days of its listing in the *Federal Register*, the disposal agency may then proceed with its routine disposal process, in accordance with applicable law.

In addition to publication in the *Federal Register*, the requirements of Title V require GSA, HHS, and HUD to make such efforts as are necessary to ensure the widest possible dissemination of the listing information of available properties. For example, HUD is required to forward lists of all real property published in the *Federal Register* to USICH, which then must distribute relevant portions of the list to state and regional homeless coordinators. Also, when HUD determines an excess real property is suitable and publishes it in the *Federal Register* as available, the implementing regulations require GSA to concurrently notify HHS, HUD, and state and local governments, in addition to homeless assistance providers that have expressed interest in the particular real property, and other organizations, as appropriate, concerning suitable properties.¹⁷

Notices of interest and application: HHS is to evaluate applications of homeless assistance providers on a first-come, first-serve basis using five

¹⁵ If the application is for a deed conveyance of the property (meaning that the title of the property passes from the government to the grantee) as opposed to a lease, the private sector organizations must be incorporated under section 501(c)(3) as tax-exempt organizations.

¹⁶ Written notice of intent to apply for a property may also be filed after the 60-day holding period. Such applications may be approved if the property remains available for homeless assistance use.

¹⁷ 42 C.F.R. § 581.5(f); 41 C.F.R. § 102-75.1180(f); 45 C.F.R. § 12a.5(f).

criteria defined in HHS implementing regulations.¹⁸ HHS may specify additional criteria for the application package for a given real property if it deems it necessary. The criteria are as follows:

- *Proposed service offering*: the extent and range of proposed services, such as meal, shelter, job training, and counseling.
- *Need*: the demand for the program and the degree to which the available real property will be fully utilized.
- *Implementation time*: the amount of time necessary for the proposed program to become operational.
- *Experience*: demonstrated prior success in operating similar programs and attestations by federal, state and local authorities.
- *Financial ability*: the adequacy of funding that will likely be available to fully run the proposed program and operate the facility.

HHS review of application, application approval, and transfer of property: HHS is to review applications for completeness and, in some cases, may request additional information from the applicant, as necessary. Evaluations must be completed in 25 days from the receipt of the completed application.

If HHS approves an application for underutilized or unutilized real property, the landholding agency can execute a lease of the property to the applicant. In the case of surplus real property, the disposal agency “assigns” the property to HHS, which then becomes the sponsoring agency and transfers the deed to the applicant. Grantees of federal properties under the Title V homeless assistance program must utilize the property in accordance with the approved application for the length of the lease or, in the case of deed conveyances, for 30 years.

Pursuant to HHS policies and procedures, HHS is to perform compliance oversight and ensure that the grantee uses the real property according to the terms in the approved application. To accomplish this, grantees are required to submit annual utilization reports to HHS, and HHS is to conduct site visits of the properties at least once every 5 years. In the event that a grantee is not implementing or is unable to implement the

¹⁸ 45 C.F.R § 12a.9(e)(2).

program consistent with the approved application, the property title may revert back to the federal government.¹⁹

Title V of the Act has been amended several times, including by the Base Closure Community Redevelopment and Homeless Assistance Act of 1994²⁰ (the Redevelopment Act or Act). According to HUD, this Act aimed to improve the process for disposing buildings and property at military installations under the existing base closure laws. Under the Act, which became effective shortly after the beginning of fiscal year 1995, Department of Defense (DOD) properties disposed under the Defense Base Closure and Realignment Act of 1990²¹ were no longer subject to the Title V homeless assistance program requirements. According to HUD, many individuals involved in military base reuse concluded that Title V did not adequately address the multiple interests related to large parcels of surplus federal properties such as military bases. In general, with respect to the disposal of buildings and property located at installations approved for closure or realignment, the Redevelopment Act substituted a community-based process for the Title V homeless assistance program, in which the local redevelopment authority prepares a reuse plan after consulting with representatives of the homeless and other community groups affected by the base closure, and HUD ensures that the plan appropriately balances the needs of the community for economic and other development with the needs of the homeless.²² We excluded from this report facilities on military bases closed after 1994 and subject to the provisions of the Redevelopment Act, as we are reviewing implementations of the Act's provisions separately and plan to report on the results in 2015.

¹⁹ According to HHS, reversion for reasons of noncompliance is typically a measure of last resort and undertaken only when other attempts at bringing the grantee into compliance or a retransfer to another provider have failed.

²⁰ Pub. L. No. 103-421, 108 Stat. 4346.

²¹ Pub. L. No. 101-510, 104 Stat. 1485, 1808.

²² Such properties are subject to a process that involves Local Redevelopment Authorities' (LRA) consultation with representatives of the homeless in the communities in the vicinity of the installation concerned to determine the need for homeless assistance and how portions of the former military installations might be used to meet it. LRA redevelopment plans are reviewed by HUD. Homeless assistance providers apply to the LRA for property on such installations that might be used to assist the homeless.

Several court orders resulting from a 1988 lawsuit filed by the National Law Center on Homelessness and Poverty (National Law Center) and other advocates for the homeless have also shaped the implementation requirements of the Title V homeless assistance program. The 1988 lawsuit alleged, and the court found, that the federal government was not fully complying with some Title V requirements. The court issued an order in 1993 imposing requirements beyond those mandated by the statute and implementing regulations, such as more comprehensive reporting requirements and expanded outreach. Unlike the 1993 District Court order, a more recent 2013 order does not require widespread changes to operational administration of the Title V homeless assistance program but rather seeks to better educate the landholding agencies about canvassing their real property and improving the quality of data reported by these agencies for Title V requirements and the Federal Real Property Profile.²³

122 Properties Transferred Have Provided a Range of Homeless Assistance Services, but Many Properties Reported and Deemed Suitable for Homeless Assistance May Not Be Useful for That Purpose

Under the Title V homeless assistance program, providers have used over 100 transferred properties since program inception through March 31, 2014, to deliver a range of services across the country. However, few of the properties that HUD has determined to be suitable and were available for homeless assistance since the program's inception received applications from homeless assistance service providers. In most cases, properties screened and determined as suitable and available may not have actually been practical for homeless service providers to use. For example, our analysis of HUD's annual reports from 2008 through 2013 found most of the properties published as suitable and available were for off-site use only—meaning that a provider would need to physically move the property in order to use it.

²³ The Federal Real Property Profile, created pursuant to Executive Order 13327, is the federal government's inventory system that is to contain data on all real property assets within and outside the United States, including improvements on federal land. Executive Order No. 13327, *Federal Real Property Asset Management*, 69 Fed. Reg. 5897 (Feb. 6, 2004).

Homeless Assistance Providers Currently Use 81 Title V Properties for a Range of Services across the Country

The Title V homeless assistance program has provided properties with useful facilities. As of March 2014, of the 122 properties transferred since the program's inception in 1987, 81 properties are currently in use by providers. For the other 41 properties, there are several explanations as to why they are no longer in use for homeless assistance. For example, leases for 9 properties were rescinded for failure to use the properties for the agreed upon purposes, and deeds for 8 properties reverted to the government for reasons such as non-compliance or by request of the grantee. Across the country homeless assistance providers use the 81 properties to provide a range of homeless assistance services, such as supportive services, referral services, various forms of temporary or more permanent housing, administrative offices, and clothing or food distribution. The 81 active properties include approximately 470 buildings of about 1.5-million square feet and over 500 acres of land. The properties include a variety of facilities ranging in size from 1900 square feet to 512,000 square feet and vacant land ranging from almost two tenths of an acre to over 96 acres. Of the 81 currently active properties, not-for-profit organizations—such as the Salvation Army, Samaritan House, and Volunteers of America—acquired 69, and local governments acquired 12. A few local governments formed public/not-for-profit collaborations to develop the properties. Figure 2 shows the geographic distribution of the properties.

Map of the United States showing the number of states with a specific number of red dots. The dots are distributed across the states, with California having 18 dots and Texas having 6 dots. The map is color-coded by the number of dots: 1 dot (light blue), 2 dots (medium blue), 3 dots (dark blue), 4 dots (very dark blue), 5 dots (black), 6 dots (dark grey), 7 dots (medium grey), 8 dots (light grey), 9 dots (white), 10 dots (lightest blue), 11 dots (light blue), 12 dots (medium blue), 13 dots (dark blue), 14 dots (very dark blue), 15 dots (black), 16 dots (dark grey), 17 dots (medium grey), 18 dots (light grey), 19 dots (lightest blue), 20 dots (light blue), 21 dots (medium blue), 22 dots (dark blue), 23 dots (very dark blue), 24 dots (black), 25 dots (dark grey), 26 dots (medium grey), 27 dots (light grey), 28 dots (lightest blue), 29 dots (light blue), 30 dots (medium blue), 31 dots (dark blue), 32 dots (very dark blue), 33 dots (black), 34 dots (dark grey), 35 dots (medium grey), 36 dots (light grey), 37 dots (lightest blue), 38 dots (light blue), 39 dots (medium blue), 40 dots (dark blue), 41 dots (very dark blue), 42 dots (black), 43 dots (dark grey), 44 dots (medium grey), 45 dots (light grey), 46 dots (lightest blue), 47 dots (light blue), 48 dots (medium blue), 49 dots (dark blue), 50 dots (very dark blue).

Note: Red “bulls-eyes” represent the geographical location of Title V homeless assistance program properties. There may be more than one Title V homeless assistance program real property at a given location. For example, seven Title V homeless-assistance program properties are located at Fort Ord in Monterey, California.

Providers at 60 of the 81 currently active properties offer multiple services to homeless individuals. For example, one provider said it offers support services such as substance abuse counseling, mental health services, case management, job training and placement. Another provides emergency, transitional, and permanent supportive housing; a health clinic; and daycare services. A third uses a former army depot to distribute goods and clothing (see table 2 for more information on the types of services provided and app. IV for more information on the services provided at each of the 81 locations). According to the National Law Center's 2011 estimate,²⁴ more than 2.4 million homeless Americans each year have received assistance through the Title V homeless assistance program since its inception.

Table 2: Types of Homeless Assistance Services Offered at the 81 Active Properties, as of March 31, 2014

Services offered ^a	Number of providers offering services
Supportive services ^b	43
Transitional housing ^c	42
Referral services	37
Emergency shelter ^d	19
Permanent supportive housing ^e	12
Administrative offices	11
Goods/clothing distribution	8
Education/job training	6
Daycare/day center	5
Food distribution	2
Mental Health	2
Warehouse and storage	2
Case management	1

Source: GAO analysis of HHS information. | GAO-14-739

^a Many service providers offer multiple services at the same location based on HHS data. For example, 26 of the 81 service providers offer three different types of services.

^b Supportive services is a broad category that may include services such as child care; employment assistance; employment counseling; outreach, advocacy, life skills training, and housing search, and counseling services; outpatient health services; trauma counseling and victim services.

²⁴ *Federal Property Disposal*: Hearing before the House Committee on Oversight and Government Reform, 112th Cong. (2011) (statement of Ms. Maria Foscarinis, Executive Director, National Law Center on Homelessness & Poverty).

^c Transitional housing is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months, or a longer period as approved by HUD.

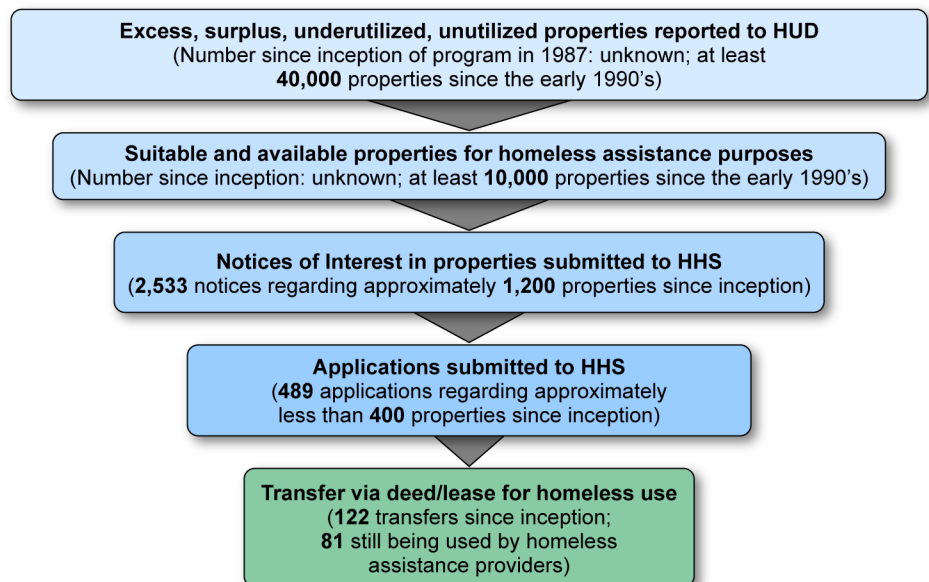
^d Emergency shelter is any facility with overnight sleeping accommodations, to provide temporary shelter for the homeless.

^e Permanent supportive housing is long-term, affordable, community-based housing that is linked to appropriate supportive health and social services (e.g., substance abuse, mental health, case management, medical care services, and services for the disabled and frail elderly) that enable homeless individuals and homeless families with disabilities to maintain housing. There is no time limit to residency, provided a tenant meets the conditions of occupancy as established by the program.

Few Properties Deemed Suitable and Available for Homeless Assistance Were of Interest or Received Applications from Service Providers

Of the at least 10,000 properties determined to be suitable and available, approximately 1,200 properties received notices of interest, and we estimate that fewer than 400 properties received applications from homeless assistance providers, resulting in the transfer of 122 properties to assist the homeless in the 26 years since Title V's inception through March 2014 (see fig. 3).

Figure 3: Estimated Number of Properties Potentially Available for Homeless Assistance Compared to the Total Number of Properties Transferred under the Title V Homeless Assistance Program, 1987–2014



Source: GAO analysis of information from HUD officials and HHS data. | GAO-14-739

According to HHS data, since the inception of the program in 1987, most properties deemed by HUD to be suitable and which are available for homeless assistance have not received notices of interest or applications

from homeless service providers. In addition, we found that in many cases, suitable and available properties may not have been practical for homeless service providers to use. Our analysis of HUD's 2013 annual report published in the *Federal Register* found 630 properties published as suitable and available including buildings ranging from a 12 square foot storage shed to a 75,720 square foot building in a restricted area, and vacant land ranging from about one hundredth of an acre to over 15 acres. These properties may be inconveniently located at a distance from existing communities or public transportation, within a military installation, or in poor condition—conditions consistent with what we found in our prior work (see table 3).²⁵

²⁵ GAO, *Federal Real Property: Most Public Benefit Conveyances Used as Intended, but Opportunities Exist to Enhance Federal Oversight*. [GAO-06-511](#) (Washington, D.C.: June 21, 2006).

Table 3: Examples of Suitable and Available Properties in 2013 That May Not be Practical for Homeless Assistance Use

Location	HUD description of property
Dublin, CA	Building, off-site use only: 30 square feet; control tower; poor conditions; restricted area; transferee must obtain real estate doc. to access/remove; contact Army for more information
West Sacramento, CA	Building: 3,840 square feet; 9 months vacant; poor conditions; restricted area; transferee will need an escort to access property
St. George Island, FL	Land: 0.34 acres; tower & fence needs to be removed; remote access; contact Air Force for more information
Ft. Benning, GA	Building, off-site removal only; 192 square feet; Sep Toile/Shower; poor conditions; secured area; contact Army for info. on accessibility/removal
Hawaii National Park, HI	Building, off-site removal only; 100 square feet; pollutant catch basin; poor conditions
Wahiawa, HI	Building, off-site use only: 512 square feet; storage; 46 yrs.-old; poor conditions
Johnston, IA	Building, remote/secured area: 3,076 square feet; family housing; 816+months vacant; deteriorated; escort required; contact Army for accessibility requirements
Mystic, IA	Building, off-site removal only; 80 square foot storage shed; one plus months vacant; deteriorated
Ft. Riley, KS	Building, off-site removal only; 128 square feet; latrine; deteriorating conditions; located on controlled area; contact Army for more information
Indian Head, MD	Building, off-site use only: 480 square feet; chemical plant 20+yrs. vacant; contaminated; major renovations required for other use
Smithville, MO	Building, off-site use only: 100 square feet; toilet needs extensive repairs
Lawton, OK	Building, off-site use only: 24,072 square feet concrete block/w brick
Stigler, OK	Building, off-site removal only; 24 square feet water well; poor conditions
Valliant, OK	Building, off-site removal only; 12 square feet; storage; flammable materials; poor conditions
Charleston, SC	Land: 5.59 acres; contamination; contact Navy for more information
Purdon, TX	Building, off-site use only: 624 square feet; 30+ years; restroom

Source: GAO analysis of HUD's 2013 Title V Annual Report. | GAO-14-739

As noted above, HUD is required to evaluate the properties and applies criteria that are defined in implementing regulations. A landholding agency may indicate on the Title V checklist, for example, that a property has extensive deterioration, but according to HUD officials, if the landholding agency does not provide supporting documentation, HUD may deem the property suitable for homeless assistance. As a result, HUD designates many properties as suitable with deficiencies that may therefore make them less desirable to homeless assistance providers. The suitability criteria in HUD's regulation for implementing the Title V homeless assistance program include provisions for excluding properties with deficiencies such as contamination, structural damage or extensive deterioration that are documented, extensive, and considered by HUD as representing a clear threat to personal safety. For example, while HUD did not determine conditions to rise to the level of a "documented deficiency," our analysis of the 630 suitable and available properties

reported in the HUD’s 2013 annual report found properties with conditions described as “deteriorated” (35 properties) and in “very poor condition” (18 properties).

Moreover, almost 80 percent of the properties published as suitable and available in 2013 were for “off-site use only.” These properties refer to buildings and other removable structures that are located on land that is not surplus and, therefore, must be removed and relocated. According to officials from the National Law Center, the costs of moving the building, preparing the land on which to relocate the building, and making improvements needed to convert the building to provide services are often beyond the budget of the homeless-assistance service providers.

Officials from four of our nine selected landholding agencies told us they believe that properties for off-site use only are not practical for homeless assistance services. In addition, although an HHS official with responsibility for the Title V program told us that four of the 122 properties transferred under the Title V homeless assistance program were made available for off-site use only, these properties were trailers, which are designed to be easily moved, as opposed to other types of off-site properties described below, which may not be easy to move. For 2013, the most recent year reported, of the 630 properties HUD listed as suitable and available in the annual report, 78 percent were for “off-site use only” (see table 4).

Table 4: Number of Properties HUD Reported Suitable and Available for “Off-site Use Only”

Year of reporting	Total number of properties reported to HUD	Number of properties that were “Suitable/Available”	Percentage of total that were “Suitable/Available”	“Suitable/Available” properties that were for “off-site use only”	Percentage of “Suitable/Available” properties that were for “off-site use only”
2013 only	766	630	82%	489	78%
2008 – 2013 ^a	1,677	1,102	66%	859	78%

Source: GAO Analysis of HUD 2008-2013 Annual Reports published in the *Federal Register*. | GAO-14-739

^a Our analysis of HUD’s annual reports published in the *Federal Register* for calendar years 2008 through 2013 identified 1,677 properties reported over the 6 years, of which 982 (59 percent) appeared in more than one annual report and 288 (17 percent) appeared in each of the six annual reports.

Since the majority of properties reported as suitable and available in 2013 were for off-site use only, as a result, they may be impractical for homeless assistance. For example, according to U.S. Army officials, since most of the Army’s properties reported under Title V are located on secured installations and do not involve the transfer of land, these

properties are often made available to homeless assistance providers for “off-site use only.” In addition, because most buildings in the Army’s inventory consist of masonry and steel, the removal of these properties is costly. As a result, U.S. Army officials said that very few homeless assistance providers have expressed interest in Army properties designated for “off-site use” since the program’s inception.²⁶ Similarly, DOI officials told us that because the agency does not relinquish federal park lands, the buildings published as suitable and available located within federal parks are also designated for “off-site use only.” Many federal park lands are in remote areas, and moving a building from those locations can be costly.

USICH’s 2011 agency annual report stated that, because of the wide latitude in the suitability standard, a clear majority of the properties HUD finds “suitable” are not actually practical for homeless assistance.²⁷ As noted above, HUD considers all property suitable for homeless assistance unless a property’s characteristics meet one or more of six conditions, such as national security concerns or location in a floodway. The relatively large numbers of properties deemed by HUD to be suitable and that were available may give homeless assistance providers, the public, and other stakeholders a false impression as to what properties are of practical use for homeless assistance because they included a large proportion of properties that have substantial deficiencies. In turn, this may mislead stakeholders about the extent to which the federal government is providing federal real property for homeless assistance.

An additional concern with HUD’s Title V data lies in the limitations of its Title V database that HUD uses to store information on properties reported by landholding agencies and report them to the public. According to HUD officials, the agency has screened at least 40,000 properties since the early 1990s, of which at least 10,000 (at least 24 percent) were determined to be suitable and were available for homeless use (see fig. 3). These estimates are based on HUD’s Title V database, which was developed in the early 1990s, and maintains data on the properties reported to HUD by landholding agencies and HUD’s suitability

²⁶ According to our analysis of HHS data, properties made available for “off-site use only” received fewer than 30 notices of interest from 1988 through March 31, 2014.

²⁷ United States Interagency Council on Homelessness. *Opening Doors: Appendix: Programs for People Experiencing Homelessness* 2011 (Washington, D.C.: 2011).

determinations.²⁸ However, HUD's database does not have the capability to generate reports on properties or data for the purpose of analyzing the properties reported for the Title V homeless assistance program. For example, when we asked HUD for reports from the database in order to perform our own analysis, such as the total number of properties reviewed for suitability and the total number published as suitable and available since program inception, the agency was unable to provide these data to us. The database was designed, and is primarily used, to generate listings of properties for publication in the *Federal Register*. The PDF format of the *Federal Register* reports poses challenges for automated analysis, and as a result, we had to manually count numbers of properties in specific categories to ensure the validity of our analysis, such as those for off-site use only reported in table 4. *Standards for Internal Control in the Federal Government* states that managers are responsible for providing reliable, useful, and timely information for transparency and accountability of programs and their operations.²⁹ Reliability also means that for any computer processing of the data elements used, the results are reasonable, complete, and accurate. In addition, federal information technology guidance for publicly available data states that accessible data should be made available in convenient, modifiable formats that can be retrieved, downloaded, indexed, and searched.³⁰ As the database cannot produce reports on the properties, HUD relies on hard-copy record keeping, which limits HUD's ability to make information on properties readily available, requiring labor intensive use of resources to find needed data. This capability is important because Title V requires HUD to make available to the public upon request all information in its possession about all properties reviewed and not identified as suitable for the homeless—about 30,000 properties according to HUD's estimate—including the reasons such properties were not so identified.³¹ Moreover, HUD officials told us that during the recent litigation, the plaintiffs hired a contractor to make copies of the requested

²⁸ HUD officials were uncertain when in the early 1990s the database was created and about the number of properties that were added to the database screened prior to its creation.

²⁹ GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington D.C.: November 1999).

³⁰ Executive Order No. 13642, *Making Open and Machine Readable the New Default for Government Information*, 78 Fed. Reg. 28111 (May 14, 2013).

³¹ 42 U.S.C. §11411(c)(1)(C).

data from HUD's hard copy files, and it took three individuals several weeks to complete the task. Without a comprehensive database that maintains this information, HUD would need to respond to such a request on up to 30,000 properties by manually looking through files, which would not be an efficient use of resources. Because HUD uses the database primarily for generating listings, it has not assessed the extent to which the benefits of modifying the database to generate electronic reports for the purposes of responding to information requests or performing analysis, or if developing a new database to do so would outweigh the costs. Modifying its database, or developing a new one that is electronically searchable, would better position HUD to respond to information requests.

Landholding Agencies Report Many Properties That May Not Be Useful to Assist the Homeless, and Do Not Report Some Properties

While it is HUD's role to assess the suitability of properties for use to assist the homeless, some federal landholding agencies report many properties to HUD that may not, in the landholding agencies' estimation, be useful to assist the homeless. However, a few landholding agencies' officials told us that they do not report such properties or other surplus, underutilized, and unutilized properties because the reporting requirements are labor intensive or the properties may not be useful to the homeless. As noted above, the Title V homeless assistance program requires quarterly reporting and completion of a checklist for each property. The following examples illustrate the variety of Title V reporting practices among the agencies we reviewed.

- U.S. Navy officials told us that they report only excess properties to HUD because of the size of their real property portfolio—approximately 85 installations, and over 65,000 buildings and structures. According to these officials, the Navy does not have the resources to report on underutilized and unutilized property, which they said would require constant monitoring. Furthermore, the Navy also does not report some properties within Navy installations that do not allow public access within certain areas.
- US Army officials said that they report eligible Title V property to HUD but noted that the Title V process is time-intensive for several reasons. They noted that the Army may report up to 500 properties to HUD each quarter and that HUD requires submission of each property checklist in hard copy. In addition, U.S. Army officials said that the Army has to submit a Title V checklist each time it wants to demolish an installation building and that the Title V homeless-assistance program-reporting requirements could add about 6 months to the demolition process.

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- DOE officials said that they report to HUD the property they are required to report, but believe that completing the Title V reporting requirement was not an efficient use of their resources since much of the agency's reported real property has documented deficiencies, including environmental contamination requiring remediation, and is located within secured boundaries and HUD determines many of these unsuitable for homeless assistance. For example, DOE properties typically include radiological contaminants commingled with other metals and chemicals associated with nuclear research and production. In our prior work, DOE also told us that the department understood the need to screen excess real property, but that much of its portfolio to be disposed had no remaining useful life and was most often located within a secure compound.³²
 - DOI officials said that they are required to—and do—report to HUD on numerous small, remotely located properties in National Parks that they have decided to dispose. For example, many cabins are not accessible by road or may be accessible only by water and only during certain times of the year. Officials also told us that in 2013, 73 properties, mainly small houses on National Park lands were determined suitable but for off-site use only, yet the majority of these properties were in such poor condition that they could not be moved. In addition, DOI officials said that they do not report to HUD real property that is only used seasonally as unused or underutilized because the agency will use the properties again in the following season. The Title V homeless assistance program checklist, however, expressly asks whether an underutilized property is used seasonally (see app. II: HUD Title V Checklist Submitted to Landholding Agencies, item 6B).
 - EPA officials noted that although some of its laboratories are only partially used, they do not report these as underutilized real property for HUD's Title V canvass because they do not believe they are required to do so. Rather, EPA's practice has been to report that it does not have any underutilized or unused properties for each quarterly canvass because the space is laboratory space that agency officials do not think is practical for homeless assistance programs. EPA officials said that they are currently conducting a space utilization study for laboratories, and after the study is completed, they will

³² GAO, *Federal Real Property: Progress Made Toward Addressing Problems, but Underlying Obstacles Continue to Hamper Reform*. [GAO-07-349](#) (Washington, D.C.: Apr. 13, 2007).

determine whether to report underutilized and unutilized properties identified through the study.

- GSA officials told us that as a provider of space to other federal agencies, GSA properties are sometimes temporarily or partially vacant as the space needs of tenant agencies fluctuate. GSA officials said that they do not consider these properties to be underutilized and unutilized because the agency plans to use them to house future federal tenants. GSA officials said that if they identified underutilized and unutilized property in the portfolio that was not to be reported as excess, they would report these to HUD's canvass. However, GSA could not identify any such properties that it had reported to HUD in the 6 years from 2008 through 2013. Nonetheless, even if GSA identified a future need for temporarily or partially vacant space, it, like other agencies, has two opportunities to inform HUD as to why reported properties may not be available: first, the HUD Title V checklist asks reporting landholding agencies to provide information on any current or anticipated limitations for using the property to assist the homeless for a period of one year or more; second, landholding agencies are required to provide statements to HUD on the availability of properties determined suitable, including reasons why the property cannot be declared excess or made available for use to assist the homeless.

HUD officials told us that they review and make a suitability determination only for those properties reported to them by landholding agencies and that they do not have a way of knowing how many properties should be, but are not reported. In 2013, the U.S. District Court for the District of Columbia noted that many landholding agencies appeared to be "failing to fairly and accurately" report Title V homeless assistance program-eligible properties as required under both the statute and Order.³³ Further, the court noted that there was a significant discrepancy between the numbers of properties reported to HUD under Title V and the much larger number of federal properties listed as "excess" or "underutilized" in other government reports and surveys. The District Court ordered several steps to ensure the proper reporting of properties including that GSA and HUD develop a plan for additional improved training programs for landholding agencies. To address the court order, GSA and HUD officials told us they conducted a joint webinar with HHS in November 2013 for landholding agencies.

³³ See Court Order accompanying *National Law Center on Homelessness and Poverty v. Veterans Admin.*, 931 F. Supp. 2d 167, 174 (D.D.C. 2013).

HUD officials told us that they would prefer that agencies not be required to report certain types of properties at all because they may not be useful to assist the homeless. Requiring agencies to report all properties that fall within the four broad categories—excess, surplus, underutilized, and unutilized—may not be effective for certain types of properties. While there are discretionary elements in HUD’s suitability criteria that are applied to properties submitted by the landholding agencies, HUD does not have the authority to release agencies from their statutorily required reporting of certain types of properties. Excluding certain types of properties such as “off-site use only properties” could enable HUD officials to focus on the suitable and available properties that may be more likely to assist the homeless and could help address issues of landholding agencies not reporting certain properties. In 2013, HUD proposed a revision to the law that would limit some of the types of properties agencies report, such as those that are located in high security areas and any building or structure that is made available for off-site use only. No action has been taken on that proposal.

Homeless Assistance Providers Expanded Services, but Some Reported Encountering Challenges in Identifying, Applying for, and Using Real Property

Of the 11 homeless assistance providers we interviewed, the eight case study providers that acquired property cited benefits from the Title V program, such as expanding services and obtaining real property at no cost. These successes notwithstanding, the providers identified challenges such as locating information on available properties, a complex application, difficulty altering the approved use of transferred properties, and competing stakeholder interests. For example, although HUD reports properties in the *Federal Register* multiple times a year, and USICH provides links to them on its website, many homeless assistance providers may be unaware of the availability of properties. This may be because homeless assistance stakeholders have said the *Federal Register* is not user-friendly. Further, HUD’s *Federal Register* reports list many of the same properties more than once. This may make listings even less user-friendly to providers. Homeless assistance providers and advocates we interviewed identified a number of actions that could address these challenges.

The Title V Homeless Assistance Program Enabled Selected Providers to Expand Services and Obtain Real Property at No Cost

Of the 11 homeless assistance providers we interviewed, the eight case study providers that acquired property cited a variety of benefits resulting from the acquisition of real property under the Title V homeless assistance program.³⁴ Representatives of the providers responsible for the eight case study properties we reviewed either said that the Title V program enabled them to expand their program or service capacity (five providers) or acquire real property at no cost (four providers). Representatives of two providers cited both types of benefits (see app. V for a description of each of the case study properties).

For example, the following providers spoke of how they were able to expand their programs through the Title V homeless assistance program:

- The acquisition of the former Boyle Heights Social Security Administration Building in Los Angeles enabled Volunteers of America of Los Angeles (VOALA) to offer services for the homeless, including referral services, food and clothing distribution, and job training in Los Angeles. VOALA reported serving more than 1,000 persons at this facility in 2013.
- The acquisition of an 84-acre portion of the former Homestead Air Force Base in Homestead, Florida, enabled Miami-Dade County to provide comprehensive services, including emergency shelter, transitional housing, and permanent supportive housing, in addition to job training, medical care, and clothing, among other services. In 2013, the Miami-Dade County Homeless Trust reported serving 2,143 homeless adults and minors at this facility.³⁵

Other providers described how the Title V homeless assistance program enabled them to acquire property otherwise not affordable:

- Prior to acquiring four homes located in residential neighborhoods on Maryland's Eastern Shore, Crossroads Community, Inc. rented real property to provide rehabilitative services to individuals with mental illness in residential settings. Through the Title V homeless assistance program, the provider was able to replace rental property at a

³⁴ Altogether, we interviewed 11 homeless assistance providers, including representatives from eight case study properties that were acquired under Title V and three providers whose applications for property were not approved by HHS.

³⁵ The Miami-Dade County Homeless Trust is an organization within the Miami-Dade County government that is responsible for coordinating local homeless systems of care.

relatively low renovation cost with four homes that it acquired through the program. In addition, the program property allowed the provider to locate clients closer to its other service programs. According to Crossroads Community, Inc., the acquisition of the four houses currently saves the organization about \$62,000 in rent on an annual basis.

- According to a representative of the City of Redmond, Washington, the greatest benefit of the Title V homeless assistance program lies in providing opportunities for non-profit organizations to acquire real property at minimal or no cost. The city acquired at no cost about half of a 10.2 acre site under the program that included 16 housing units formerly used to house U.S. Coast Guard personnel. The City of Redmond purchased the remainder of the real property through a negotiated sale with GSA. From the outset, the city planned to redevelop the Title V homeless assistance program portion of the real property into a larger facility to assist the homeless and 1-acre park, and develop the non-Title V portion into affordable housing units. Leveraging its resources, the city redeveloped the Title V homeless assistance program portion of the real property with 59 housing units that provided emergency, transitional, and permanent supportive housing for 319 households in 2013.

In addition to enabling homeless assistance providers to expand their services and obtain property they would likely have to pay for otherwise, the National Law Center stated that the Title V homeless assistance program also benefits the taxpayers by repurposing and reusing real property no longer needed by the federal government, helping the government—and by extension, the taxpayers—avoid and eliminate the maintenance and operation costs of retaining these properties.

Selected Homeless Assistance Providers Reported a Range of Challenges in Identifying, Acquiring, and Using Federal Real Property

Most Selected Homeless Assistance Providers Were Unaware of *Federal Register* Notices

These successes notwithstanding, homeless assistance providers we interviewed identified challenges such as locating information on available properties, a complicated application, difficulty altering the approved use of transferred properties, and competing stakeholder interests.

Although HUD reports regularly in the *Federal Register* for the purpose of informing homeless assistance providers about properties, among the 11 homeless assistance providers we interviewed, one said it was initially unaware of the program or the availability of real property in its area, and eight told us they eventually learned about the program through third

parties rather than through the *Federal Register*. Title V requires HUD to publish, in the *Federal Register*, a list of real property it has evaluated for suitability. This occurs multiple times each year: four quarterly reports and a summary annual report. In addition, to comply with the 1988 court order, as modified in 1993, HUD publishes a weekly notice in the *Federal Register* of properties that are suitable and available, unavailable, and unsuitable (see table 5).

Table 5: Department of Housing and Urban Development’s (HUD) *Federal Register* Reporting Requirements

Type of report	Time frame/ publication date	Purpose	Source authority
Reporting (general)	No later than 15 days after receiving reports from landholding agencies	Publish suitability determination of properties submitted to HUD by landholding agencies	42 U.S.C § 11411 (c)(1)(A).
Two <i>comprehensive</i> quarterly reports	End of 1st quarter – January 1 and End of the 3rd quarter – July 1	Publish newly reviewed properties as well as previously reported properties that may or may not have changes	42 U.S.C. § 11411 (c)(1)(A); <i>National Law Center on Homelessness and Poverty v. Veterans Admin.</i> , 819 F. Supp. 69 (D.D.C. 1993).
Two <i>supplemental</i> quarterly reports	End of the 2nd quarter and End of the 4th quarter – October 1	Publish only newly reviewed properties from the previous quarter	42 U.S.C. § 11411 (c)(1)(A); <i>National Law Center on Homelessness and Poverty v. Veterans Admin.</i> , 819 F. Supp. 69 (D.D.C. 1993).
Annual report	Previous calendar year/around February 15	Publish all the properties identified as suitable/available and suitable/unavailable in the prior calendar year in addition to suitable properties from prior years that were republished and may still be available or for which the availability status has changed	42 U.S.C § 11411 (c)(1)(D), (c)(4)(B).

Source: GAO Analysis of 42 U.S.C §11411, National Law Center on Homelessness and Poverty v. Veterans Admin., 819 F. Supp. 69 (D.D.C. 1993) and HUD documents. | GAO-14-739

HUD shares the *Federal Register* notices of suitable and available properties with the U.S. Interagency Council on Homelessness (USICH) multiple times a year, and USICH provides links to the list on its agency website. Nonetheless, according to national homeless advocates, many providers remain unaware of the availability of properties. For example, the National Law Center reported that despite the Title V homeless assistance program’s having been in existence for 25 years, too few local government and homeless providers are aware that they are eligible to

receive property free.³⁶ Moreover, a representative from the National Coalition for the Homeless told us that in general, homeless assistance providers do not have the staff resources to check the *Federal Register* consistently.

In addition, HUD's *Federal Register* reports list many of the same properties more than once, as required, and that may make listings more confusing and less useful for providers to use. For example, for the period from 2008 through 2013, 59 percent of the properties appeared in more than one annual report. Because, under Title V, suitable properties must be reported on an ongoing basis until they are disposed of—regardless of their availability status—HUD reports some properties in the *Federal Register* multiple times, in some cases over several years, even though homeless assistance providers have not expressed interest in these properties. Our analysis of HUD's annual reports for calendar years 2008 through 2013 found that of the 1,677 properties reported over the 6 years, 982 (59 percent) appeared in more than one annual report and 288 (17 percent) appeared in each of the six annual reports. For example, we found one property in Baltimore, Maryland, that was listed in three annual reports from 2011 through 2013. In another case in Macon, Alabama, a property was listed in HUD's annual reports each year from 2008 through 2011. In the past, some in Congress and the executive branch have expressed concern about reporting requirements; the basic concern has been that some requirements result in reports that may be unnecessarily burdensome to produce or, in some instances, not very useful. Our prior work at other federal agencies has reviewed reporting requirements, the limited usefulness of some reports, duplicative reporting, and has found that less frequent reporting could allow agencies to continue to fulfill their responsibilities.³⁷

HUD officials told us that, instead of publishing suitable and available properties in the *Federal Register*, they believe it would be more efficient

³⁶ National Law Center on Homelessness and Poverty. *This Land Is Your Land: How Surplus Federal Property Can Prevent and End Homelessness* (Washington, D.C.: October 2013).

³⁷ See for example, GAO, *Video Marketplace: Competition Is Evolving, and Government Reporting Should Be Reevaluated*. [GAO-13-576](#) (Washington, D.C.: June 25, 2013), and GAO, *K-12 Education: Selected States and School Districts Cited Numerous Federal Requirements As Burdensome, While Recognizing Some Benefits*. [GAO-12-672](#) (Washington, D.C.: June 27, 2012).

and beneficial to homeless providers to publish the information on their Community Planning and Development “OneCPD” website, which serves as a resource exchange and provides technical assistance to stakeholders for a wide variety of programs including the Title V homeless assistance program. Further, both the National Law Center and the National Coalition for the Homeless suggested that available properties should be listed on the Internet in an easily accessible format, unlike the *Federal Register*, which they said is not user-friendly. Some stakeholders suggested that the federal government could make information more accessible by establishing a single web-based source of information on the program. However, if HUD were to report Title V properties on its OneCPD website, this would add to HUD’s other reporting requirements if the Title V reporting requirements remained unchanged, and HUD officials do not believe they have the resources to do both.³⁸

Complex Application

Five of the homeless assistance providers we interviewed noted challenges with the application. Two providers reported that completing the application required additional resources and was time consuming, particularly in obtaining technical reports such as environmental assessments. For example, one organization hired a contractor to prepare the application, which was nearly 300 pages long and required extensive technical documentation. In another case, the representative said that the application process was time consuming because of the large volume of supporting documentation required. Among the homeless assistance providers we interviewed, one reported obtaining the environmental reports from GSA, while others paid a consultant to obtain the documentation or used their resources to collect it for the purpose of the application. Another provider noted that GSA responded slowly to requests for both access to the site and for documentation, such as site blueprints. According to this representative, GSA took nearly 60 days of the 90-day application period to provide access and documentation that had been requested at the beginning of the application process.³⁹ Based on our work, we believe the large difference, discussed above, between the number of notices of interest and the number of applications may be,

³⁸ HUD has taken steps to help homeless assistance providers learn about properties such as a listserv and a call-in line that providers can use to obtain information about properties.

³⁹ According to the implementing regulations, HHS is to assist applicants in obtaining any pertinent environmental information in GSA, HUD or any other landholding agency’s possession. 45 C.F.R. §12a.9(b)(8).

Difficulty Altering Approved
Real Property's Use to Meet
Changing Client Needs

in part, due to the complexity and resources required to complete the application within a 90-day period. These case study results are consistent with the National Law Center's findings, which state that the application is lengthy and cumbersome, making it difficult for a homeless assistance provider to complete in the short time frame imposed under the law. In addition, the application calls for homeless assistance providers to collect information that is already in the government's possession, such as a description of the easements on the property.⁴⁰ The HHS Title V official told us that several years ago, the Department modified the application packet to address some of these stakeholder concerns. Two homeless assistance providers we interviewed suggested that HHS consider providing examples of model applications on a public website. HHS officials told us that they believe posting examples of successful applications on the Internet may lead to homeless assistance applicants using examples that may not be relevant to their particular circumstances.

HHS, as the agency responsible for ensuring that homeless providers use the transferred real properties according to the approved application, also approves any changes to the original program of use for the properties. Two of the selected case study providers told us that they found it difficult to alter the original program of use for their properties. According to the two providers, the needs of the homeless clientele they serve had changed since their applications were approved. For example, one provider told us that the homeless population the organization currently serves largely consists of persons recently released from incarceration and, unlike the population it served when the property was first transferred in 2002, is perhaps better educated than the previous population. This provider stated that due to the changing population, workforce training has become more of a need than it was in the past. The provider noted that it took many letters to convince HHS that workforce training was a necessary part of the organization's homeless assistance. Another provider obtained a property for use as transitional housing for mentally ill homeless adults and wanted to alter the program to provide permanent housing to this population; a representative for that provider told us that the organization has thus far decided not to pursue its request to HHS because it understands that it would have to restart the

⁴⁰ National Law Center on Homelessness and Poverty. *This Land Is Your Land: How Surplus Federal Property Can Prevent and End Homelessness* (Washington, D.C.: October 2013).

Competing Stakeholder Interests

application process.⁴¹ HHS Title V homeless assistance program representatives told us, that while much of the information requested for the original application would need to be resubmitted, the provider would not need to resubmit a full application.⁴²

Our literature review and case study interviews found that homeless assistance organizations often reported meeting resistance from local interests and groups when attempting to acquire federal properties. Further, USICH's 2011 annual report noted that, in some cases, local opposition to the use of the property by homeless providers has caused them to withdraw their applications to the Title V homeless assistance program.⁴³ Two of the homeless providers we interviewed for our case studies reported meeting strong community opposition, which, according to one provider, related to concerns about safety, number of homeless assistance facilities within a given area, and the impact on real property values, for example:

- One case study provider, whose real property is located in an industrial, non-residential area, told us that the organization changed its original plan from providing shelter services to providing job training and social services instead of shelter in response to local opposition from neighboring businesses.
- Another case study provider encountered strong local opposition to its proposal to use the four residential properties as locations for clients undergoing mental health rehabilitation. The provider said its organization mitigated the resistance over the course of a year by

⁴¹ HHS concluded in 1992 that long-term housing did not constitute an appropriate use of property authorized under Title V and subsequently adopted the HUD standard, limiting occupancy to 24 months. However, HHS revised this policy effective September 1, 2006, to include permanent supportive housing, i.e., long-term, affordable housing that is linked to appropriate supportive health and social services that enable homeless individuals and homeless families with disabilities to maintain housing. 71 Fed. Reg. 38882. (July 10, 2006).

⁴² HHS officials noted that it requires the grantees wishing to change their approved program to address similar questions for the change as were required in the initial application. For example, the grantee must identify the need for the revised program and the funding available to implement the change. This information is used by HHS to make a determination on the need for the revised program within the community and if it is sustainable for the duration of the deed or lease.

⁴³ United States Interagency Council on Homelessness. *Opening Doors: Appendix: Programs for People Experiencing Homelessness 2011* (Washington, D.C.: 2011).

holding multiple informational community meetings and conducting a workshop on removing the stigma associated with mental illness and homelessness at a local community college. Since the program has been in place, the organization has not experienced any further opposition to the program.

- Another case study provider described how the organization successfully addressed and minimized the potential for local opposition. In this case, the City of Redmond, Washington, worked with an inter-local government organization—A Regional Coalition for Housing (ARCH)—in acquiring the Title V real property. The City and ARCH then worked with a consortium of homeless providers in developing a homeless assistance program. Anticipating concerns, particularly from nearby residents, ARCH and the city staff reached out to the neighborhood to ensure that neighborhood interests were represented during the planning phase of the program, including a series of meetings.

Our prior work has found similar competing stakeholder interests. For example, state and local governments, business interests in the communities where the assets are located, private sector construction and leasing firms, various advocacy groups, and the public in general have an interest in how the federal government carries out its real property management practices.⁴⁴ We have raised this concern as an underlying problem in our biennial high-risk area updates on federal real property.⁴⁵ In addition, we recommended to the Office of Management and Budget (OMB) in 2012, the development of a cohesive national strategy for managing federal excess and underutilized real property that would also address competing stakeholder interests. OMB did not directly state whether it agreed or disagreed with our recommendation.⁴⁶ Moreover, OMB has not taken action on our recommendation as of the time of this report.

All four federal agencies—GSA, HHS, HUD and USICH—bear some responsibility for addressing challenges homeless assistance providers face with the Title V homeless assistance program, such as identifying and acquiring properties and developing a web-based source of

⁴⁴ [GAO-07-349](#).

⁴⁵ [GAO-13-283](#).

⁴⁶ [GAO-12-645](#).

information on the program. By collaborating to address these concerns, the federal agencies could provide information that would be more useful to homeless providers and thereby more effectively manage agency resources to contribute to the goal to end homelessness. Our prior work has found that many of the meaningful results that the federal government seeks to achieve require the coordinated efforts of more than one federal agency and often more than one sector and level of government.⁴⁷ We have reported about the importance of collaboration among federal agencies for many years. In its 2011 annual report, USICH noted that the Title V homeless assistance program process for identifying properties, determining suitability, determining availability by landholding agencies, and leasing or deeding surplus properties involves at least three federal agencies and can appear quite confusing and cumbersome to homeless providers.⁴⁸ USICH is composed of representatives from 19 federal agencies—including GSA, HHS, and HUD. While not having the authority to ensure compliance, USICH monitors, evaluates, and recommends improvements in federal and state homeless assistance programs and is required by law to meet at least four times a year. USICH is supported by the Council Policy Group, which provides a regular forum for coordinating policies and programs, collecting data, developing special initiatives, and preparing recommendations for consideration by USICH members. Unlike other interagency groups, although USICH is a very small agency, it receives an appropriation from Congress and employs full-time staff in Washington, D.C., and five regional posts.⁴⁹ As such, resources and a process for addressing some of the stakeholder concerns are already in place.

Conclusion

HUD has evaluated at least 40,000 underused, unused, and unneeded federal real property assets for the Title V homeless assistance program since it began in 1987. However, only a small fraction of the properties HUD determined suitable and that were available have been transferred

⁴⁷ GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012).

⁴⁸ United States Interagency Council on Homelessness. *Opening Doors: Appendix: Programs for People Experiencing Homelessness 2011* (Washington, D.C.: 2011).

⁴⁹ GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: Feb. 14, 2014).

to homeless assistance providers since the program's inception—likely because the majority of the properties were not useful to them. The 81 active properties transferred have provided needed services to the homeless population across the nation. While HUD lists information on the properties it evaluates in the *Federal Register* multiple times each year, as required by law, many of the listings are duplicative, and many service providers are not even aware of the Title V homeless assistance program. Given that all underutilized, unutilized, excess, and surplus federal real property is subject to Title V homeless assistance program reporting requirements—including buildings, land, or both, without regard to location, size, or practicality—the scope of properties reported (with particular attention to the usefulness of the property and the frequency of reporting) is crucial to helping HUD make the program more useful to homeless assistance providers. In addition, a reliable, searchable electronic database of the properties HUD has reviewed would improve HUD's ability to provide information to meet required reporting needs. While homeless assistance providers benefitted from obtaining federal real property otherwise not affordable to them and expanded their services, addressing the challenges they face in identifying properties would improve program effectiveness. Collective efforts by all four responsible federal agencies—GSA, HHS, HUD, and USICH—could help to address these concerns. Without these changes, the Title V homeless assistance program may not be making the best use of its resources to make progress toward ending homelessness in the nation.

Matter for Congressional Consideration

To ensure that properties determined as suitable and available are more likely to be practical for homeless assistance and that *Federal Register* reporting is not redundant, Congress should revisit the scope of properties to be reported to HUD with respect to the types of properties that may be less likely to be useful to assist the homeless and the frequency of *Federal Register* reporting.

Recommendations for Executive Action

- To improve HUD's database on Title V homeless assistance properties, HUD should modify its existing database or create an electronic, searchable database to meet reporting needs to the extent that the benefits outweigh the costs.
- HUD, GSA, HHS, and USICH should work together to address the challenges that homeless assistance providers face with the Title V homeless assistance program by

-
- identifying what kinds of properties are most practical for homeless assistance, and
 - developing a web-based source of information on the program for homeless assistance providers.

Agency Comments and Our Evaluation

We provided a draft of this report for review and comment to the four agencies with a role in administering the Title V homeless assistance program: GSA, HHS, HUD, and USICH. We also provided a draft of this report to the landholding agencies we included in our review: the EPA, the DOD service branches—the U.S. Air Force, the U.S. Army and the U.S. Navy—DOE and DOI. We received written comments from GSA, HHS, and USICH, which are summarized below and reprinted in appendixes of this report. HUD’s agency liaison provided comments via e-mail on September 18, 2014, which are summarized below. In addition, GSA, HHS, HUD, the U.S. Army and the DOE provided technical comments, which we incorporated as appropriate. The EPA, U.S. Air Force, U.S. Navy, and DOI did not provide any comments.

GSA concurred with the findings of the report and the recommendation that it work with HHS, HUD, and USICH to address the challenges that homeless assistance providers face by identifying what kinds of properties are most practical for homeless assistance and developing a web-based source of information on the program for providers. GSA stated that it will continue to work with both HUD and HHS on this effort. GSA noted that it has taken steps to enhance its website with additional information and resources about the Title V homeless assistance program and provide additional information about how to locate available properties. The agency stated that it has also provided the opportunity for interested homeless assistance providers to subscribe to receive automatic e-mail notifications as properties are posted to its website. These are positive steps to provide additional information on the homeless assistance program. GSA’s comments can be found in appendix VI.

HHS did not concur with our recommendation that it should work together with GSA, HUD, and USICH to address the challenges that homeless providers face by identifying what kinds of properties are most practical for homeless assistance. HHS stated that this was outside of the scope of its legal authority and noted that under the authorizing statute and the

regulation, HUD, is solely authorized to identify suitable property and apply the suitability criteria to properties reported by landholding agencies pursuant to Title V requirements. We recognize that under the statute,⁵⁰ HUD is solely authorized to make determinations regarding whether properties are suitable for use to assist the homeless. However, the McKinney-Vento Homeless Assistance Act, as amended, required GSA, HHS, and HUD to promulgate implementing regulations. In response, GSA, HHS, and HUD promulgated a joint interim final rule that set out, among other things, the criteria to be applied by HUD in making its suitability determinations. The interim final rule putting the joint regulation in place explained that the suitability criteria have been developed with the intent of excluding only those properties that are clearly unsuitable for use to assist the homeless. The issuing agencies of the joint rule may revisit the scope of such regulatory exclusions of clearly unsuitable property to assess if they merit adjustment. Given that the rule was a joint issuance by GSA, HHS, and HUD, our recommendation that the agencies work together to identify what kinds of properties are most practical for homeless assistance is directed to the four agencies with responsibility for implementing the program. HHS concurred with the second part of the recommendation that it should work together with GSA, HUD, and USICH to develop a web-based source of information on the program for homeless assistance providers, and noted that it is in the process of refurbishing its federal real property assistance website and will consult with the other three agencies to discuss options relating to web-based sources of information on the Title V homeless assistance program. HHS's comments can be found in appendix VII.

HUD also concurred with the report's overall findings, and with the recommendation that it modify its database or create a searchable, electronic database on the Title V homeless assistance properties to meet its reporting needs. HUD officials noted that its proposed legislative changes included the development of an improved database that would be searchable and would allow HUD stakeholders to view profiles of those properties that are suitable and available to be used to assist the homeless. HUD also concurred with the recommendation that it work together with GSA, HHS and USICH to address challenges providers face with identifying the kinds of properties that are most practical for homeless assistance, and to develop a web-based source of information on the program. HUD noted that it had already proposed legislative

⁵⁰ 42 U.S.C. §11411.

changes to create a web-based source of information on available properties in place of publishing properties in the *Federal Register*. Although we support a legislative change to address certain aspects of the law, as stated in our Matter for Congressional Consideration, our recommendations to HUD are not contingent upon legislative changes. As noted in our report, because HUD uses its Title V database primarily for generating listings for the *Federal Register*, it has not assessed the extent to which the benefits of modifying it to generate electronic reports, or developing a database to do so, would outweigh the costs. In addition, as one of the four federal agencies responsible for the program, HUD shares responsibility for addressing the challenges that homeless assistance providers face, such as identifying and acquiring properties and developing a web-based source of information on the program.

USICH agreed that the scope of properties that agencies are required to report under Title V include large numbers of properties that could not viably be used for homeless assistance. However, it did not agree with our recommendation that it work together with GSA, HHS, and HUD to identify the kinds of properties that are most practical for homeless assistance. USICH stated that improving the identification of properties that are practical for homeless assistance cannot occur through collaboration alone and that a legislative fix is an essential prerequisite. We continue to believe that, as one of the agencies responsible for implementing the Title V homeless assistance program, USICH shares responsibility for addressing challenges homeless assistance providers face, such as identifying and acquiring properties. As noted in our report, by collaborating to address these concerns, the federal agencies could provide information that would be more useful to homeless providers. USICH concurred with the recommendation on developing a web-based source of information on the program for homeless assistance providers and stated that it may be beneficial for disseminating information on available federal real properties to interested stakeholders. USICH's comments can be found in appendix VIII.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the Administrators of the Environmental Protection Agency and the General Services Administration; the Executive Director of the U.S. Interagency Council on Homelessness; and the Secretaries of Defense, Energy, Health and Human Services, Housing and Urban Development, and the Interior. We are also sending copies of this report to the House Committee on

Oversight and Government Reform. In addition, this report will be available at no charge on GAO's website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-2834 or wised@gao.gov. Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IX.

A handwritten signature in black ink that reads "David J. Wise". The signature is written in a cursive, flowing style.

David J. Wise
Director
Physical Infrastructure Issues

Appendix I: Scope and Methodology

To determine what is known about the identification and transfer of federal real properties for homeless assistance under Title V, we reviewed the requirements of Title V of the Act as they apply to the General Services Administration (GSA), the Department of Health and Human Services (HHS), the Department of Housing and Urban Development (HUD), and the United States Interagency Council on Homelessness (USICH). We reviewed these agencies' internal policies, procedures and other documents on how they implement the requirements of the programs. HUD does not maintain electronic records of all the properties reported under Title V since the inception of the program. Thus, due to the lack of available data in a format that allowed analysis, HUD provided us with estimates of the number of underutilized, unutilized, excess, and surplus properties reported by landholding agencies and the number that HUD determined to be suitable and were available for homeless use from the early 1990s through March 31, 2014. These estimates are based on the number of properties that were entered into HUD's Title V database, developed in the early 1990s, several years after the McKinney-Vento Act was implemented. Further, HUD officials are not certain of the extent to which the database includes the Title V homeless assistance program properties reported prior to its creation. Due to the lack of available data in a format conducive to analysis, we could not verify the reliability of these estimates. We interviewed officials from HUD about how the estimates were derived and could not verify the reliability of these estimates. To assess the reliability of these estimates, we interviewed officials from HUD about how the estimates were derived and determined that the information provided by the agency provides a reasonable basis, with caveats, for reporting the number of properties that have been screened and published as suitable and available. In addition, to determine the number of properties reported in these categories and the number and percentage of these that were available for "off-site use only," we analyzed HUD annual reports of suitable/available and suitable/unavailable properties for years 2008 through 2013. This time frame was selected to include the 5 years prior to the audit, and when HUD's annual report for 2013 became available we added it to the analysis to include the most recent information. Our analysis of the *Federal Register* notices relied on identifying properties by the unique Property Identification (ID) number published with each property listing. We also obtained from HHS documents and data on the number of notices of interest and applications received for federal real property made available for homeless assistance and on the number, location, and use of properties transferred from the program's inception in 1987 through March 31, 2014—the date of the most recently available information.

To assess the reliability of these data, we interviewed officials from HHS about how the data are collected and maintained and the steps taken by the agency to ensure the completeness of these data. Based on this discussion, we determined that the data were sufficiently reliable for the purposes of this report. In order to assess the number of properties that received notices of interest and applications from interested providers, we also manually reviewed data on notices of interest and applications received to identify potential duplicate properties by GSA number, property name, location, and description. To understand how federal landholding agencies identify and report real property to HUD pursuant to the Act's requirements, we selected nine landholding agencies to include a range of size among real property portfolios of land and buildings. These agencies were GSA; HHS; the Departments of Defense's U.S. Army, U.S. Air Force, and U.S. Navy; the Departments of Energy; the Interior and Veterans Affairs;¹ and the Environmental Protection Agency. When combined, these nine landholding agencies accounted for almost 90 percent of the buildings held by the federal government in 2012.² We collected documents from these agencies to understand how each agency manages and fulfills its reporting requirements under Title V, the extent to which it collaborates with other agencies, and to obtain views on how Title V requirements impact the federal real property disposal process. We interviewed agency officials from the GSA, HHS, and HUD to understand how they process properties reported under Title V homeless assistance program requirements, and we interviewed officials from USICH to understand its role with Title V. We also interviewed agency officials from the nine landholding agencies to obtain their views on how they meet the Act's requirements and the impact of those requirements on each agencies disposal process.³

To determine the benefits and challenges selected homeless assistance providers and national advocacy organizations reported in identifying, acquiring and using federal real property, and the potential actions that

¹ After preliminary audit work, we did not continue our work at VA because we learned that very little of VA's property becomes available for Title V purposes.

² According HUD officials, HUD is not a landholding agency.

³ We excluded from this report facilities on military bases closed after 1994 and subject to the provisions of the Base Closure Community Redevelopment and Homeless Assistance Act of 1994 (Redevelopment Act) (Pub. L. No.103-421, 108 Stat. 4346) but are reviewing implementation of the Act's provisions separately and will report on this in 2015.

could help address those challenges, we selected eight homeless assistance organizations that acquired federal real property under the program. The providers were: the City of Redmond, Washington; Crossroads Community, Inc.; Samaritan House; The Miami-Dade County Homeless Trust; Third Way Center; Urban Renewal Corporation; Veterans Coming Home/New Life Evangelistic Center; and Volunteers of America, Los Angeles. We made our selection using criteria such as the size of the real property acquired under the program, the services provided, geographic distribution, range of experiences with the Title V program, and suggestions from agencies and homeless advocacy organizations (GSA, HUD, HHS, USICH, the National Law Center on Homelessness and Poverty, and the National Coalition for the Homeless). In addition, to assist the selection, we also used information from news reports and our literature review to identify high-profile properties. We interviewed representatives from each of the selected organizations, reviewed their annual utilization reports, and conducted site visits to two properties transferred under Title V. While information from case studies is not generalizable, the perspectives of the homeless service providers provided us with examples of the benefits and challenges associated with the program. Further, to gain additional perspectives on experiences with the federal agencies and the application process, and identify potential improvements to the process, we convened a virtual discussion panel comprised of representatives from homeless assistance organizations whose Title V applications were not approved. We selected and recruited seven organizations, of which three agreed to participate in the panel.⁴ These organizations were selected from HHS's Title V homeless assistance program applicant data from 2006 through 2013 based on their geographic locations and proposed use of the properties. We selected the particular time frame to ensure that the information provided was reasonably up to date. Since the virtual discussion panel was selected using a non-probability sample of homeless assistance applicants whose Title V applications were declined by HHS, like the case studies, their experiences cannot be generalized to all homeless service providers. In addition, we reviewed the reports and interviewed representatives of two national advocacy organizations—the National Law Center on Homelessness and Poverty and the National Coalition for the Homeless.

⁴ Representative of the other four organizations were unable to participate because of unanticipated schedule conflicts.

We conducted this performance audit from September 2013 to September 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Sample Title V Checklist Submitted by Landholding Agencies to HUD

TITLE V PROPERTY SURVEY FEDERAL PROPERTY INFORMATION CHECKLIST (REV. 11/89)

INSTRUCTIONS: 1) Use this form.
2) Complete all items below or the checklist will be returned for completion.

Date: _____ Property ID # [_____]
(HUD will assign)

1. FEDERAL LANDHOLDING AGENCY: **Bureau:** _____

2. PROPERTY (name): _____

(installation name, if applicable): _____

3. ADDRESS (street and number, or if none,
a brief description of how to locate property)

4. GSA INVENTORY CONTROL NO. (if available):

5. PREVIOUSLY REPORTED TO HUD? ☐ Yes ☐ No

Determination by HUD (date: _____): ☐ Suitable ☐ Unsuitable

6. PROPERTY DESCRIPTION:

☐ Building ☐ Vacant Land ☐ Other (improved land)

A. Current status: ☐ Unutilized ☐ Underutilized ☐ Excess ☐ Surplus

If excess or surplus, GSA Disposal Control No.:

B. If underutilized, type of underutilization (describe):

☐ Portion ☐ Seasonal ☐ Intermittent ☐ Other (describe):

C. Predominant surrounding land use:

D. Unusual physical features or impediments:

**Appendix II: Sample Title V Checklist
Submitted by Landholding Agencies to HUD**

E. Legal constraints (right of entry, covenants, permits, licenses, etc.):

F. Other (comments):

7. BUILDING DESCRIPTION:

A. Age:

B. Structure type:

C. Size (usable square feet per floor):

D. Number of floors:

E. Current or most recent use (storage, residential, office, etc.):

F. If currently occupied or leased, indicate:

- i. Percentage of total space occupied or otherwise in use: _____ percent.
- ii. Expiration date(s) of any existing lease(s) or renewal period(s):

F. If currently vacant, indicate number of months vacant: _____

8. BUILDING CONDITION: Meets or has the potential to meet the following criteria:

	MEETS		POTENTIAL	
	Yes	No	Yes	No
A. Operating sanitary facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. Potable water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C. Electric power	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. Indicate (if known) distance to nearest utility hook-up(s):				

E. Heating facilities adequate for climate ☐ ☐ ☐ ☐

F. Structurally sound

- i. Foundation ☐ ☐ ☐ ☐
- ii. Floors ☐ ☐ ☐ ☐
- iii. Roofs ☐ ☐ ☐ ☐
- iv. Exterior walls ☐ ☐ ☐ ☐
- v. Interior walls ☐ ☐ ☐ ☐
- vi. Describe general condition or extent of repairs needed

**Appendix II: Sample Title V Checklist
Submitted by Landholding Agencies to HUD**

9. VACANT LAND:

- A. Size (acres, square footage):
- B. Description of improvements (i.e. paved, etc.):
- C. Current or most recent use:
- D. If occupied, indicate:
 - i. Percentage of total land area occupied or otherwise in use: _____ percent.
 - ii. Expiration date of any existing lease or renewal period:

10. VACANT LAND CONDITION: Meets or has the potential to meet the following criteria:

	MEETS		POTENTIAL	
	Yes	No	Yes	No
A. Operating sanitary facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. Potable water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C. Electric power	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. Indicate (if known) distance to nearest utility hook-up(s):				

11. ACCESS:

- A. Does this property have public access? ☐ Yes ☐ No
If yes, how (road, other):

If no, indicate:
 - i. Distance to the nearest road:
 - ii. Type of terrain:
 - iii. Miles to nearest town/city:
Accessible by public transportation: ☐ Yes ☐ No
Type of transportation:

B. Indicate any restrictions on access (hours, etc.)

12. ENVIRONMENTAL SUITABILITY:

- A. Is the property subject to contamination by toxic or hazardous materials or waste?
☐ Yes ☐ No

Identify the basis for determination (submit documents):

If yes, also identify:
 - i. Nature of contaminants:
 - ii. Location of contaminants:
 - iii. Extent (percentage of building or number of acres affected) of contaminants:
 - iv. Any scheduled cleanup plans (include projected date of completion and estimate of cost, if known):

**Appendix II: Sample Title V Checklist
Submitted by Landholding Agencies to HUD**

- B. Is an industrial/commercial Federal facility handling flammable or explosive material (excluding underground storage) located on the property or within 2,000 feet of its boundary (exclude underground storage, gasoline stations, tank trucks, and any above-ground container(s) with a capacity of 100 gallons or less of such materials)?
☐ Yes ☐ No

If yes, indicate:

- i. Number of acres (herein being determined for possible use by the homeless) located more than 2,000 feet from such facility:
- ii. Nature of the facility and material:

- C. Is any portion of the property located within an airport runway clear zone?
☐ Yes ☐ No

If yes, indicate the portion (percentage) of the property which is so located: _____ percent.

- D. Is any portion of the property located within a 100 year floodplain? (note that the fact that a Federal property is not included in an existing floodplain map or study does not, by itself, justify a "No" answer.)
☐ Yes ☐ No

- E. Is the property impacted by any other environmental condition which might jeopardize the safety of occupants of the property (e.g., friable asbestos, PCBs, radon, periodic flooding)?
☐ Yes ☐ No

Indicate:

- i. Basis for determination (submit document):
- ii. Nature of condition:
- iii. Extent of condition:
- iv. Location of condition:

- F. Are there any other known environmental conditions which could affect or be impacted by the occupancy of the property (e.g., endangered species, wild and scenic rivers, wetlands, historic properties, storm water runoff; etc.)?
☐ Yes ☐ No ☐ Undetermined

If yes, for each:

- i. Describe the environmental condition:
- ii. Describe the potential impact:
- iii. Basis for the determination (submit document):

**Appendix II: Sample Title V Checklist
Submitted by Landholding Agencies to HUD**

13. SECURITY:

- A. Is the property located in a secure facility to which the general public is denied access?

☐ Yes ☐ No

- B. If the answer above is yes, can alternative access be provided for the general public without compromising security requirements?

☐ Yes ☐ No

Indicate method of providing access:

14. LIMITATIONS ON USE:

- A. Are there now, or are there anticipated to be, any other limitations not previously described on the use of this property to assist the homeless for a period of one year or more?

☐ Yes ☐ No

If yes, describe the limitation:

- B. Does the limitation currently exist?

☐ Yes ☐ No

If no, when will any limitation take effect? _____
(date of effect)

15. CHECKLIST CONTACT PERSON (name):

(title):

(phone number):

(email):

(date prepared):

☐ Yes ☐ No PHOTOS (not required) are attached?

☐ Yes ☐ No Additional amplifying information documents (not required) are attached?

ADDITIONAL REMARKS (if any):

Appendix III: List of Landholding Agencies HUD Canvasses for Title V

1. Central Intelligence Agency
2. Department of Commerce
3. Department of Agriculture
4. Department of the Air Force
5. Department of the Army
6. Department of the Navy
7. Department of Education
8. Department of Energy
9. Department of the Interior
10. Department of Justice
11. Department of Health and Human Services
12. Department of Labor
13. Department of State
14. Department of Transportation
15. Department of the Treasury
16. Department of Veterans Affairs
17. Environmental Protection Agency
18. Federal Communications Commission
19. Federal Emergency Management Agency
20. General Services Administration
21. International Broadcasting Bureau of the Broadcasting Board of Governors
22. National Aeronautics and Space Administration
23. National Science Foundation
24. U.S. Army Corps of Engineers
25. U.S. Coast Guard

Appendix IV: Services Provided at 81 Active Properties Transferred under Title V, by State

As of March 2014, 81 Title V properties were currently in use by homeless assistance providers across the country to provide a range of homeless assistance services. The table below presents the services provided at each location by state.

Table 6: Services Provided at 81 Active Properties Transferred under Title V, by State

Homeless Provider, Location (by State)	Services													Total Number of Services
	Supportive Services a	Transitional Housing	Referral Services	Emergency Shelter	Permanent Supportive Housing	Administrative Offices	Goods and Clothing Distribution	Education /Job Training	Daycare /Day Center	Food Distribution	Mental Health	Warehouse and Storage	Non-Use (Potential Case Management)	
Catholic Social Services, Inc., Anchorage, AK		●			●									2
Tundra Women's Coalition, Bethel, AK		●												1
Tundra Women's Coalition, Bethel, AK		●												1
Salvation Army, Benton, AR	●			●										2
The Family Center, Inc., Helena, AR.						●								1
Quapaw House, Inc., Hot Springs, AR	●	●			●									3
Our House, Inc., Little Rock, AR	●	●		●					●					4
Esperanza en Escalante, Tucson, AZ	●	●	●											3
House of Refuge, Inc., Mesa, AZ	●	●												2
House of Refuge East, Mesa, AZ	●	●												2

**Appendix IV: Services Provided at 81 Active
Properties Transferred under Title V, by State**

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The Community Housing Partnership, Inc., Mesa, AZ	●	●				●			●					4
Community Social Model Advocates, Inc., Atwater, CA	●		●			●								3
Community Social Model Advocates, Inc., Atwater, CA							●							1
Salvation Army, Bell, CA	●	●	●	●		●					●			6
Shelter Partnership, Inc, Bell, CA							●							1
Salvation Army Southern California Division, Los Angeles, CA	●	●												2
Volunteers of America of L.A., Los Angeles, CA	●		●											2
Veterans Transition Center of Monterey, Marina, CA		●												1
Housing Authority of the County of Monterey, Monterey, CA												●		1
Housing Authority of the County of Monterey, Monterey, CA	●	●	●											3

**Appendix IV: Services Provided at 81 Active
Properties Transferred under Title V, by State**

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	Supportive Services a	Transitional Housing	Referral Services	Emergency Shelter	Permanent Supportive Housing	Administrative Offices	Goods and Clothing Distribution	Education /Job Training	Daycare /Day Center	Food Distribution	Mental Health	Warehouse and Storage	Non-Use (Potential Case Management	
Interim, Inc., Monterey, CA	●	●	●											3
Shelter Outreach Plus, Monterey, CA	●	●	●											3
Shelter Plus, Monterey, CA	●	●	●											3
Vietnam Veterans of Monterey County, Monterey, CA	●	●	●											3
County of Sacramento, Rancho Cordova, CA	●	●												2
Vietnam Veterans of California, Inc., Redding, CA													●	1
California Emergency Food Link, Sacramento, CA							●							1
Grace Apostolic Church, San Bernardino, CA							●							1
Grace Apostolic Church, San Bernardino, CA							●					●		2
Third Way Center, Denver, CO		●												1
Community for Creative Nonviolence, Inc., Washington, D.C.								●						1

**Appendix IV: Services Provided at 81 Active
Properties Transferred under Title V, by State**

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Metropolitan Dade County Government, Homestead, FL		●		●	●	●			●						5
Mount Olive Community Outreach Center, Inc., Albany, GA		●		●											2
Growing Home, Inc., Miller Township, IL								●							1
5020 State Street, LLC, St. Louis, IL	●	●	●												3
North Central- Flint Hill Agency on Aging, Manhattan, KS	●		●										●		3
Aftercare Ministries, Inc., Alexandria, LA													●		1
Monroe Area Guidance Center, Monroe, LA		●		●											2
City of Lynn, Lynn, MA						●				●					2
Crossroads Community, Inc., Chestertown, MA		●													1
Health and Education Services, Inc., Topsfield, MA	●				●										2
Vietnam Veterans Workshop, Inc., Boston, MA	●	●	●	●	●										5

**Appendix IV: Services Provided at 81 Active
Properties Transferred under Title V, by State**

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	Supportive Services a	Transitional Housing	Referral Services	Emergency Shelter	Permanent Supportive Housing	Administrative Offices	Goods and Clothing Distribution	Education /Job Training	Daycare /Day Center	Food Distribution	Mental Health	Warehouse and Storage	Non-Use (Potential Case Management		
Advocates for Homeless Families, Frederick, MD		●						●							2
Catholic Charities of the Archdiocese of Washington, Inc., Waldorf, MD	●		●		●										3
City of Bangor, Bangor, ME		●													1
AMHC Facilities, Inc., Caribou, ME	●		●		●										3
Homeworkers Organized for More Employment, Ellsworth, ME				●											1
Pontiac Rescue Mission, Pontiac, MI	●	●	●	●											4
Salvation Army, Warren, MI	●			●		●									3
Salvation Army, Duluth, MN		●	●				●								3
Economic Security Corp. of Southwest Area, Joplin, MO	●		●												2
New Life Evangelistic Center, Inc., Springfield, MO			●					●							2
Human Resource Development Council, Inc., Bozeman, MT	●	●	●	●											4

**Appendix IV: Services Provided at 81 Active
Properties Transferred under Title V, by State**

Homeless Provider, Location (by State)	Services													Total Number of Services
	Supportive Services a	Transitional Housing	Referral Services	Emergency Shelter	Permanent Supportive Housing	Administrative Offices	Goods and Clothing Distribution	Education /Job Training	Daycare /Day Center	Food Distribution	Mental Health	Warehouse and Storage	Non-Use (Potential Case Management	
Samaritan House, Inc., Kalispell, MT	●		●			●								3
Housing Authority of the County of Scottsbluff, NE, Scottsbluff, NE	●		●				●							3
Middlesex Interfaith Partners with the Homeless, Edison, NJ	●	●	●											3
Urban Renewal Corp., Kearny, NJ							●	●						2
New Day, Inc., Albuquerque, NM	●		●	●										3
Overcoming- Love Ministries, Brooklyn, NY	●	●												2
Paterson Coalition for Housing, Inc., Clifton, NY		●												1
Rockland Housing Action Coalition, Inc., Tappan, NY					●									1
Neighbors of Watertown, Inc., Watertown, NY	●		●		●									3
United Christian Ministries, Lawrenceville, PA	●	●	●											3
Community Mental Health Service Properties, Inc., Phoenixville, PA		●								●				2

**Appendix IV: Services Provided at 81 Active
Properties Transferred under Title V, by State**

Homeless Provider, Location (by State)	Services													Total Number of Services
	Supportive Services a	Transitional Housing	Referral Services	Emergency Shelter	Permanent Supportive Housing	Administrative Offices	Goods and Clothing Distribution	Education /Job Training	Daycare /Day Center	Food Distribution	Mental Health	Warehouse and Storage	Non-Use (Potential Case Management	
Community Mental Health Services, Inc., West Chester, PA			●			●								2
Interfaith Hospitality Network of York County, SC, Rockhill, SC	●	●	●											3
Wintergarden Women's Shelter, Carrizo Springs, TX	●		●	●										3
Union Gospel Mission, Dallas, TX	●	●												2
Woman, Inc., Galveston, TX	●	●	●											3
New Haven Home, Mineral Wells, TX	●	●	●	●										4
Concho Valley Center for Human Advancement, San Angelo, TX					●									1
City of San Antonio, San Antonio, TX	●		●	●	●									4
Central Piedmont Action Council, Inc., Farmville,VA			●			●								2
The Salvation Army, Lynchburg, VA									●					1
County of Prince William, Woodbridge, VA	●	●	●											3

**Appendix IV: Services Provided at 81 Active
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Homeless Provider, Location (by State)	Services													Total Number of Services
	Supportive Services a	Transitional Housing	Referral Services	Emergency Shelter	Permanent Supportive Housing	Administrative Offices	Goods and Clothing Distribution	Education /Job Training	Daycare /Day Center	Food Distribution	Mental Health	Warehouse and Storage	Non-Use (Potential Case Management	
NE Kingdom Community Action, Inc., Newport, VT			●			●								2
King County Housing Authority, Kent, WA	●	●	●	●	●									5
City of Redmond, Redmond, WA		●		●										2
Integrated Community Services of Parkersburg, Parkersburg, WV	●		●	●										3
Northwood Health Systems, Inc., Wheeling, WV			●	●							●			3
Wyoming Coalition for the Homeless, Cheyenne, WY								●	●					2
Total Number of Services	43	42	37	19	12	11	8	6	5	2	2	2	2	192

Source: GAO analysis of HHS information. | GAO-14-739

Appendix V: Eight Homeless Assistance Case-Study Properties

California

Figure 4: Former Social Security Administration Building

Property Name:	Boyle Heights Social Security Building
Location:	Los Angeles, California
Property Description:	1 building; .95 acre
Notice of interest date:	2/3/2009
Application date:	3/31/2009
Year transferred:	12/14/2009 (deed conveyance)
Grantee:	Volunteers of America, Los Angeles
Homeless Assistance Use:	Supportive and referral services



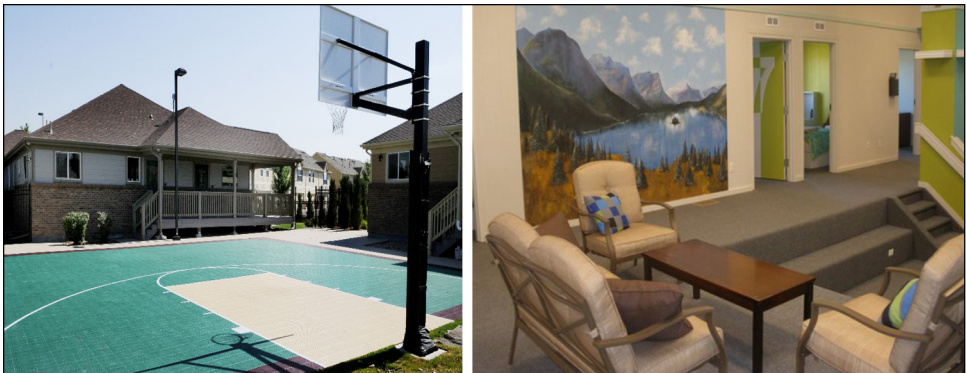
Source: GAO. | GAO-14-739

Volunteers of America of Los Angeles (VOALA) is a non-profit human services organization committed to serving people in need, strengthening families, and building communities. The property consists of a single-story masonry building in very good condition. VOALA offers several homeless assistance programs at the site including Early Head Start, which provides comprehensive services to homeless families with children under 4 years of age; Incarcerated Veterans Transition Program, which provides employment support for veterans about to be released or just released from incarceration; Female & Single Head of Household, which provides case management services to female and single head-of-household veterans; and Supportive Services for Veteran Families, which provides a housing placement program. According to VOALA, the four programs served 1,029 individuals in 2013.

Colorado

Figure 5: Former Lowry Air Force Base Building

Property Name:	Lowry Air Force Base Building
Location:	Denver, Colorado
Property Description:	1 building (6,800 square feet); 1.8 acres
Notice of interest date:	10/06/1999
Application date:	1/06/2000
Year transferred:	6/03/2003 (deed conveyance)
Grantee:	Third Way Center
Program Use:	Includes shelter, job training, and education



Source: Third Way Center, Denver, CO. | GAO-14-739

Third Way Center is a non-profit organization that provides transitional housing and round-the-clock psychiatric care for at-risk youth in Denver, CO. The property was originally part of the Lowry Air Force Base, which closed as a result of the Base Realignment and Closure Act (BRAC) in 1991. Since the property became available as a result of a pre-Redevelopment Act BRAC action, it was subject to Title V Homeless Assistance Program reporting requirements. According to HHS, one factor in the long period between the base closure and when the property became available was the environmental clean-up that was required at the site. When Third Way acquired the property in 2003, the property consisted of a one-story building that the provider subsequently demolished to construct four residential homes. The organization uses this property to provide a number of services to homeless adolescents—including shelter, meals, job training, mental health treatment, and an on-site, state-approved high school.

Florida

Figure 6: Former Homestead Air Force Base

Property Name:	Homestead Air Force Base
Location:	Homestead, Florida
Property Description:	0 buildings; 84.2 acres
Notice of interest date:	12/22/1993
Application date:	11/16/1995
Year transferred:	6/28/1996 (deed conveyance)
Grantee:	The Miami-Dade County Homeless Trust
Program Use:	Includes shelter, education, and mental health treatment



Source: Miami-Dade Homeless Trust, Miami-Dade County, FL. | GAO-14-739

The Miami-Dade County Homeless Trust is an organization within the Miami-Dade County government that is responsible for coordinating local homeless systems of care. The organization applied for and was conveyed 84 acres of unimproved land from the former Homestead Air Force Base, which was closed as a result of the Base Realignment and Closure Act in 1993. Since then, Miami-Dade Homeless Trust has developed the property, including a 300-bed emergency housing facility, a 192-bed transitional housing facility, and a 580-bed facility for families with individuals having disabling conditions. Services at these facilities include case management, adult and vocational education, job training, and various medical services. There is also a working farm and farmer’s market on the property. According to Miami-Dade Homeless Trust, homeless assistance was provided at the property to more than 2,000 individuals in 2013.

Maryland

Figure 7: Former U.S. Coast Guard Family-Housing Site

Property Name:	Stillpond Housing Units, U.S. Coast Guard (4 homes)
Location:	Chestertown, MD
Property Description:	4 homes (each approx 1,100 square feet); 1.32 acres
Notice of interest date:	1/31/2002
Application date:	5/10/2002
Year transferred:	8/13/ 2002 (deed conveyance)
Grantee:	Crossroads Community, Inc., Centreville, MD
Homeless Assistance Use:	Transitional housing for adults in mental health rehabilitation programs.



Source: GAO. | GAO-14-739

Crossroads Community, Inc. is a nonprofit organization that provides a full array of psychiatric rehabilitation and case management services to adults and children through five counties on Maryland’s Eastern Shore. The property consists of two raised foyer and two ranch homes located in Chestertown, Maryland, but the houses are not contiguous to each other. All four houses are being utilized as residences for a Residential Rehabilitation Program licensed by the State of Maryland. The program provides for licensed, supervised transitional housing for homeless adults who have mental illness. The people served are expected to transition to a less supervised setting within 24 months. Crossroads Community, Inc. initially met strong local opposition to its application and program as a result of an unrelated crime that occurred several years prior to the property becoming available. The organization was able to overcome opposition through a combination of informational meetings and a workshop at a local community college. Crossroads Community, Inc would like to convert at least two of the houses to permanent supportive housing sometime in the future.

Missouri

Figure 8: Former Social Security Administration Building

Property Name:	Social Security Administration Building
Location:	Springfield, Missouri
Property Description:	1 building (17,346 square feet); 1.08 acres
Notice of interest date:	11/1/2005
Application date:	1/30/2006
Year transferred:	9/5/2007 (deed conveyance)
Grantee:	Veterans Coming Home/New Life Evangelistic Center
Homeless Assistance Use:	Daytime respite center for homeless adults; case management



Source: New Life Evangelistic Center, Springfield, MO. | GAO-14-739

Veterans Coming Home Center is a program of New Life Evangelistic Center (NLEC), non-denominational, faith-based organization headquartered in St. Louis, MO. Although NLEC initially wanted to use this property as emergency shelter for homeless veterans, it was unable to win the approval of local authorities for this purpose. As an alternative, NLEC developed the property as a daytime respite center, providing access to food and hot beverages, laundry services, free clothing, and referral services, among other services. According to an NLEC representative, Veterans Coming Home expanded its outreach to all members of the homeless population in 2008, its second year of operation at the recommendation of HHS. In addition, beginning in 2012, Veterans Coming Home introduced counseling and case management services through partnerships with other organizations. According to the annual report submitted to HHS, Veterans Coming Home provided services to 421 homeless persons in 2013.

Montana

Figure 9: Former Sonstelie Hall Army Reserve Center

Property Name:	Sonstelie Hall Army Reserve Center
Location:	Kalispell, Montana
Property Description:	2 buildings (13,100 square feet and 750 square feet); 2.42 acres
Notice of interest date:	11/5/2007
Application date:	12/06/2007
Year transferred:	7/18/2008 (deed conveyance)
Grantee:	Samaritan House
Program Use:	Administrative offices, case management, job training.



Source: Samaritan House, Kalispell, MT. | GAO-14-739

Samaritan House is a non-profit organization that has provided assistance to the homeless population in Kalispell, MT since 1991 through its several facilities. The organization uses this particular property, which consists of a main building and garage, to provide case management, job training, tutoring, meetings, and food, clothing and furniture distribution. According to Samaritan House, the acquisition of this property enabled an increase in capacity at its transitional housing facility by moving some of the operations that had been housed there to this facility, resulting in the addition of 13 beds. According to Samaritan House, the facility was used to provide homeless assistance to more than 1,100 individuals in 2013.

New Jersey

Figure 10: Former Naval Reserve Center

Property Name:	Naval Reserve Center
Location:	Kearny, New Jersey
Property Description:	1 building (about 50,000 square feet); 2.63 acres
Notice of interest date:	4/26/2001
Application date:	6/27/2001
Year transferred:	3/27/2002 (deed conveyance)
Grantee:	Urban Renewal Corp.
Program Use:	Workforce development, GED training, and warming station during winter months



Source: Urban Renewal Corp., Kearny, N.J. | GAO-14-739

The Urban Renewal Corp. is a community-based, non-profit organization providing a variety of services to vulnerable populations in New Jersey. This property consists of a four-story building that was formerly used as a Naval Reserve Center. The building is currently used to provide the homeless with job training and education, in addition to a variety of social services, such as substance abuse and HIV/AIDS counseling, and case management. Initially, the Urban Renewal Corp. had intended to use the property as a homeless shelter, but after facing strong local opposition, it revised its intended program of use to include only non-shelter services to the homeless. Although it is not formally used as a shelter, the provider is authorized to use the facility as a warming station during the winter months to house up to 20 homeless people per night when outside temperatures fall below a certain point.

Washington

Figure 11: Former U.S. Coast Guard Housing

Property Name:	U.S. Coast Guard Family Housing Site
Location:	Redmond, Washington
Size:	18 Buildings; 5.1 acres
Notice of interest date:	7/5/1996
Application date:	11/15/1996
Transfer Date:	9/25/1997 (deed conveyance)
Grantee:	City of Redmond, Washington
Homeless Assistance Use:	Emergency shelter; transitional housing; case management



Source: City of Redmond, Redmond, WA. | GAO-14-739

When the City of Redmond learned that federal real property would become available for homeless assistance within its boundaries, it retained an “inter-local” governmental organization that it is a member of, A Regional Coalition for Housing (ARCH), to assist the city in preparing an application and developing a program for the property. The property consisted of a 5.1 acre parcel including 18 residences that had been used to house U.S. Coast Guard staff. The city contracted with a consortium of four homeless assistance providers to rehabilitate and operate the existing units for transitional housing on 4.1 acres of the site, reserving the remaining acre for a recreational area. In 2003, the consortium demolished the original units and replaced them with new buildings that included a total of 59 housing units to provide transitional housing for the homeless. According to the City of Redmond’s most recent Annual Utilization Report to HHS, the property, now called Avondale Park, provided emergency shelter and transitional housing in calendar year 2013 to 319 individuals.

Appendix VI: Comments from the General Services Administration



The Administrator

September 18, 2014

The Honorable Gene L. Dodaro
Comptroller General of the United States
U.S. Government Accountability Office
Washington, DC 20548

Dear Mr. Dodaro:

The U.S. General Services Administration (GSA) appreciates the opportunity to review and comment on the draft report entitled *Federal Real Property: More Useful Information to Providers Could Improve the Homeless Assistance Program* (GAO-14-739).

As the primary disposal agent for surplus Federal real property, GSA utilizes authorities enabling various disposition methods in order to reposition real property as efficiently as possible, providing services to communities and value to the American tax payer. One of these disposal methods is Title V of the McKinney-Vento Homeless Assistance Act, 42 USC 11411. After an audit of the program, the Government Accountability Office (GAO) recommended that GSA work with the Department of Housing and Urban Development (HUD) and Health and Human Services (HHS) to identify what kinds of properties are most practical for homeless assistance and develop a web-based source of information on the program for homeless assistance providers. GSA agrees with this recommendation and will continue to work with both HUD and HHS on this effort.

The GSA Office of Real Property Utilization and Disposal has enhanced its website with additional information and resources for those seeking information regarding the McKinney-Vento Homeless Assistance program. The McKinney-Vento module of the website now includes "3 Easy Ways" to locate properties available for homeless assistance through GSA. The three easy ways include individual screening notices for each property available through GSA that can be viewed by the user; step-by-step instructions on how to search the Federal Register for notices of property reviewed by HUD for suitability to assist the homeless; and an option for homeless assistance providers to subscribe to receive automatic e-mail notifications when GSA posts a new property on its website. In addition, GSA has provided links on its website to both HUD and HHS, to enable users to more easily locate program information and resources.

During fiscal year 2014, GSA provided increased guidance to other landholding agencies with regard to the requirements of the McKinney-Vento program. In addition to a joint webinar conducted with HUD and HHS in November 2013, GSA also provided

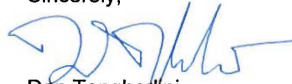
U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405
Telephone: (202) 501-0800
Fax: (202) 219-1243

training to twenty-five agencies while conducting the Real Property Utilization and Disposal Training classes during May through August of 2014. GSA also conducted McKinney-Vento program training for the U.S. Department of Agriculture in November 2013 and to the National Aeronautics and Space Administration in August 2014.

GSA agrees with GAO's suggestion that revisiting the scope of properties reported to HUD may be valuable and could limit current confusion, and is prepared to assist Congress with any information that may be needed for its consideration of the GAO suggestion.

If you have any additional questions or concerns, please contact me at (202) 501-0800, or Ms. Lisa Austin, Associate Administrator, Office of Congressional and Intergovernmental Affairs, at (202) 501-0563.

Sincerely,



Dan Tangherlini
Administrator

Enclosure

cc: David J. Wise, Director, Physical Infrastructures Issues, GAO

Appendix VII: Comments from the Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

OFFICE OF THE SECRETARY

Assistant Secretary for Legislation
Washington, DC 20201

SEP 16 2014

David J. Wise
Director, Physical Infrastructure Team
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Mr. Wise:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled, "Federal Real Property: More Useful Information to Providers Could Improve the Homeless Assistance Program" (GAO-14-739).

The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

A handwritten signature in cursive script that reads "Jim R. Esquea".

Jim R. Esquea
Assistant Secretary for Legislation

Attachment

GENERAL COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES (HHS) ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED: FEDERAL REAL PROPERTY: MORE USEFUL INFORMATION TO PROVIDERS COULD IMPROVE THE HOMELESS ASSISTANCE PROGRAM (GAO-14-739)

The Department appreciates the opportunity to review and comment on this draft report.

GAO Recommendation 1

HUD, GSA, HHS and USICH should work together to address the challenges that homeless assistance providers face with the Title V homeless assistance program by identifying what kinds of properties are most practical for homeless assistance.

HHS Response 1

HHS non-concurs with GAO's recommendation. Under the current legal framework, determinations concerning what kinds of properties are most practical for homeless assistance purposes are outside the scope of HHS' authority. Pursuant to 42 U.S.C. § 11411, HUD is solely authorized to identify suitable property. If a property is found to be suitable by HUD after applying the criteria at 45 C.F.R. Part 12a.6, the individual landholding agency in control of the property is responsible for making a determination of availability. While HHS may assist potential applicants that have questions regarding a specific property that has been made available, the ultimate decision on the practicality of using available property for the potential applicant's purpose is solely the potential applicant's determination.

GAO Recommendation 2

HUD, GSA, HHS and USICH should work together to address the challenges that homeless assistance providers face with the Title V homeless assistance program by developing a web-based source of information on the program for homeless assistance providers.

HHS Response 2

HHS concurs with GAO's recommendation. HHS is in the midst of revamping its Federal Real Property Assistance website and will consult with HUD, GSA and the USICH on recommendations for the site and discuss other options relating to web-based sources of information on Title V, McKinney-Vento Homeless Assistance Act.

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



September 19, 2014

Mr. David Wise
Director
U.S. Government Accountability Office
441 G Street N.W.
Washington, D.C. 20548

Dear Mr. Wise:

This letter is in response to GAO's draft report entitled, *Federal Real Property: More Useful Information to Providers Could Improve the Homeless Assistance Program (GAO-14-739)*. Thank you for the opportunity to review and comment on the report.

USICH agrees that if the intent of Title V were fully realized, it could expand the inventory of properties dedicated to meeting the needs of people who experience homelessness. Yet, as the report indicates, the current legislative requirements related to identifying, determining suitability, listing, and categorizing properties are complex and cumbersome. Therefore, connections between available properties that are most likely to be useful to homelessness efforts and interested, qualified parties could be advanced by actions that provide clarity and permit agencies to make necessary changes.

GAO recommended two actions relating to USICH: (1) collaborating with HUD, GSA, and HHS to identify the kinds of properties most practical for homeless assistance, and (2) developing a web-based source of information on the program for homeless assistance providers.

With regards to the first recommendation, as reflected in GAO's recommendation to Congress, the scope of properties that agencies are required to report under Title V include large numbers of properties that could not viably be used for homelessness assistance. Therefore, improving identification of properties that are actually practical for homeless assistance cannot occur through collaboration alone, a legislative fix is an essential prerequisite.

USICH concurs with the second recommendation that the development of a web-based system may be beneficial for disseminating information on available Federal real properties to interested stakeholders, including homeless assistance providers.

If you have any further questions, please contact me at Laura.Zeilinger@usich.gov or 202-708-4663.

Sincerely,

A handwritten signature in blue ink, appearing to read "Laura Zeilinger".

Laura Zeilinger
Executive Director

Appendix IX: GAO Contact and Staff Acknowledgments

GAO Contact

David J. Wise, (202) 512-2834, or wised@gao.gov

Staff Acknowledgments

In addition to the contact named above, Amelia Shachoy, Teresa Spisak (Assistant Directors), Lindsay Bach, Jennifer Clayborne, Kathleen Gilhooly, Geoffrey Hamilton, Delwen Jones, Rosa Leung, John Mingus, Josh Ormond, Amy Rosewarne, and Elizabeth Wood made key contributions to this report.

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