

**DRAFT**

**Policy Guidelines for Regional Response for Addressing Unsheltered Homelessness and Encampments Throughout San Diego County**

**Purpose:**

It is the intent of these Policy Guidelines to provide overall guidance on a shared vision and approach for San Diego County, including all 18 cities and the unincorporated areas, for addressing the needs of individuals experiencing unsheltered homelessness, including those living in vehicles, and those residing in encampments. The guidelines outlined in this document serve to guide all necessary stakeholders (Stakeholders) - including the County of San Diego and effected departments, local municipalities and respective departments, other local government agencies that interact with unsheltered individuals such as transportation entities, homeless services organizations, faith-based organizations, and public and private funders - in a shared vision and approach grounded in research and best practices for effectively addressing unsheltered individuals and encampments across the County. These guidelines incorporate national guidance on street outreach and addressing encampments from the United States Interagency Council on Homelessness (USICH) and what is known about the effectiveness of various encampment responses from the United States Department of Housing and Urban Development (HUD), but also reflect local input, dynamics, and structures.<sup>1 2 3</sup> In order to better meet the needs of unsheltered individuals, including those residing in vehicles and in encampments, all county departments, all 18 cities and respective city departments, other government agencies, homeless services organizations, faith-based organizations, and public and private funders should strive to align their policies and procedures with these guidelines while coordinating resources and working together under a shared vision and goal. With all Stakeholders aligning under a unified vision and adopting best practices for addressing unsheltered homelessness, including those in vehicles and encampments, it is expected that unsheltered homelessness will decrease over time in the County, successful placements into housing from street outreach programs will increase, and unsheltered individuals will receive necessary services and supports including health and behavioral healthcare.

It should be noted that these guidelines are not representative of the current state of practice nor do they provide specific details regarding how the guidelines will be implemented, operationalized, or funded. Rather, these guidelines provide a set of policies for shaping future efforts, guiding funding and resource allocation decisions, and can be used to inform implementation activities. Lastly, it is important that the activities that stem from these guidelines are continuously measured and evaluated to understand the effectiveness of these guidelines and that regular adjustments be made based on objective data.

**San Diego Current State:**

Over the last several years, San Diego County has consistently ranked among the top ten communities in the nation with the largest number of persons experiencing unsheltered homelessness. The United

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<sup>1</sup> United States Interagency Council on Homelessness (USICH) (2019) Core Elements of Effective Street Outreach to People Experiencing Homelessness, [https://www.usich.gov/resources/uploads/asset\\_library/Core-Components-of-Outreach-2019.pdf](https://www.usich.gov/resources/uploads/asset_library/Core-Components-of-Outreach-2019.pdf)

<sup>2</sup> USICH (2015) Ending Homelessness for People Living in Encampments: Advancing the Dialogue, [https://www.usich.gov/resources/uploads/asset\\_library/Ending\\_Homelessness\\_for\\_People\\_Living\\_in\\_Encampments\\_Aug2015.pdf](https://www.usich.gov/resources/uploads/asset_library/Ending_Homelessness_for_People_Living_in_Encampments_Aug2015.pdf)

<sup>3</sup> United States Department of Housing and Urban Development (HUD) - Office of Policy Development and Research (2019) Understanding Encampments of People Experiencing Homelessness and Community Responses: Emerging Evidence as of Late 2018, <https://www.huduser.gov/portal/sites/default/files/pdf/Understanding-Encampments.pdf>

States Department of Housing and Urban Development (HUD) defines individuals living unsheltered as those residing in places not meant for human habitation such as cars, parks, sidewalks, abandoned buildings, or on the street.<sup>4</sup>

According to the 2019 Point-In-Time (PIT) Count there were a minimum of 4,476 unsheltered persons across San Diego County. At a regional level, central San Diego (City of San Diego) accounted for 58% (2,600 persons) of the unsheltered population, East County 13% (563 persons), North County Inland 11% (493 persons), North County Coastal 11% (471 persons), and South County at 8% (349 persons). According to the 2018 PIT Count, 35% are age 55 and older, African Americans and Native Americans are disproportionately represented compared to the general adult population in the County, 43% reported a chronic health condition, 43% reported a mental health issue, and 14% reported a substance abuse issue. *(Note: update with 2019 figures when available)*

There are substantial costs, both human and fiscal, associated with unsheltered homelessness. First and foremost, living unsheltered significantly impacts people who experience it.<sup>5</sup> Residing in unsheltered situations is traumatic, dangerous, and jeopardizes the health and well-being of those who are most vulnerable. Without shelter to provide social and environmental protection, individuals in unsheltered situations are exposed to numerous health threats ranging from violence to illness. Unsheltered homelessness also significantly increases costs related to healthcare, public safety, commerce, sanitation, the environment, tourism, and is a constant concern of the general public.<sup>6</sup>

At this time, there is a lack of both temporary housing options (shelter) and permanent housing options to meet the needs of those living unsheltered across San Diego County. Temporary housing options are designed to provide support and shelter while bridging the gap between homelessness and permanent housing,<sup>7</sup> whereas permanent housing provides community-based housing options without a designated length of stay in which formerly homeless individuals and families live as independently as possible.<sup>8</sup>

The Regional Task Force on the Homeless (RTFH) has taken a leadership role in coordinating efforts to address homelessness, including unsheltered homelessness, across multiple sectors including local, state, and federal government agencies, non-profits, healthcare, philanthropy, education, formerly homeless individuals and those currently experiencing homelessness, and business leaders. Key Stakeholders throughout the region are already making significant progress in coordinating outreach efforts to address unsheltered homelessness. The RTFH, County, non-profits, various cities, and several law enforcement agencies who have dedicated Homeless Outreach Teams (HOT) are convening and working together on the issue more than ever before. For years, local law enforcement has served a key role in providing outreach to individuals experiencing unsheltered homelessness and connecting them with shelter and services. These policy guidelines incorporate a shift to having service providers lead

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<sup>4</sup> United States Department of Housing and Urban Development (2008) A Guide to Counting Unsheltered Homeless People; Office of Community Planning and Development, <https://www.hudexchange.info/onecpd/assets/File/Guide-for-Counting-Unsheltered-Homeless-Persons.pdf>

<sup>5</sup> Roncarati JS, Baggett TP, O'Connell JJ, et al. Mortality Among Unsheltered Homeless Adults in Boston, Massachusetts, 2000-2009. *JAMA Intern Med.* 2018;178(9):1242-1248.

<sup>6</sup> California State Auditor Report 2017-112 (April 2018), "Homelessness in California: State Government and the Los Angeles Homeless Services Authority Need to Strengthen Their Efforts to Address Homelessness", page 25, <http://www.auditor.ca.gov/pdfs/reports/2017-112.pdf>.

<sup>7</sup> Homeless Hub (2019) Transitional Housing, <https://www.homelesshub.ca/solutions/housing-accommodation-and-supports/transitional-housing>.

<sup>8</sup> HUD, Continuum of Care Interim Rule, 24 CFR Subpart A - General Provisions, §578.3.

outreach efforts and place a central role in addressing encampments in order to allow law enforcement officers to focus on enforcement and public safety needs, while continuing to reflect the continued critical role of law enforcement in homeless outreach and engagement efforts.

### **National Guidance:**

According to the National Alliance to End Homelessness (NAEH), key factors that influence levels of unsheltered homelessness include dynamics of local housing markets such as high rents and low vacancy rates, supply and availability of homeless assistance resources such as permanent and temporary housing (i.e. shelter), and having high barriers for individuals and families to receive assistance.<sup>9</sup> More affordable and supportive housing resources are critical to addressing unsheltered homelessness. Having the appropriate amount of low-barrier shelter beds necessary for unsheltered individuals to exit the streets quickly also needs to be part of the solution. Additionally, communities need to have effective engagement strategies to work with those experiencing unsheltered homelessness, as well as coordinated encampment responses to support those with exiting encampments while balancing the needs of the general public.

USICH has provided guidance on ensuring engagement services, specifically street outreach services, are using best practices and are coordinated as well as guidance on addressing encampments that San Diego has taken into consideration. In regards to engagement, USICH has provided guidance on effective street outreach that includes the following:

- 1) Street Outreach Efforts are Systematic, Coordinated, and Comprehensive;
- 2) Street Outreach Efforts Are Housing Focused;
- 3) Street Outreach Efforts Are Person-Centered, Trauma-Informed, and Culturally Responsive; and
- 4) Street Outreach Efforts Emphasize Safety and Reduce Harm.<sup>10</sup>

In regards, to addressing encampments, it is first important to understand what is considered an encampment. According to HUD:

*“The term encampment has connotations of both impermanence and continuity. People are staying in temporary structures or enclosed places that are not intended for long-term continuous occupancy on an ongoing basis. Inhabitants may be a core group of people who are known to one another and who move together to different locations when necessary, or they may be a changing group of people who cycle in and out of a single location. The physical structures that make up encampments can take many forms, including tents on pallets and shanties, or lean-to shacks built with scavenged materials. Structures may be simple or complex multiroom compounds.”<sup>11</sup>*

USICH has provided insight and perspective regarding addressing encampments and has noted that:

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<sup>9</sup> National Alliance to End Homelessness (2017) Unsheltered Homelessness: Trends, Causes, and Strategies to Address, <https://endhomelessness.org/wp-content/uploads/2017/07/unsheltered-brief-final-7.26.pdf>

<sup>10</sup> USICH (2019) Core Elements of Effective Street Outreach to People Experiencing Homelessness

<sup>11</sup> United States Department of Housing and Urban Development – Office of Policy Development and Research (2019) Understanding Encampments of People Experiencing Homelessness and Community Responses: Emerging Evidence as of Late 2018.

*People sleeping and living in encampments are diverse and the housing and services interventions provided must address a range of needs, challenges, and goals. Some people may be experiencing chronic homelessness and need access to permanent supportive housing, intensive services, and healthcare supports; other people may need rapid re-housing interventions with less intense services; and others may need to be linked to mainstream affordable housing opportunities.*

*The forced dispersal of people from encampment settings is not an appropriate solution or strategy, accomplishes nothing toward the goal of linking people to permanent housing opportunities, and can make it more difficult to provide such lasting solutions to people who have been sleeping and living in the encampment.<sup>12</sup>*

Communities across the country are responding to encampments in various ways with some more effective than others. HUD has categorized responses to encampments into four general typologies:

- 1) **Clearance with No Support:** Notice of pending sweeps provided only a few days in advance, if at all; Belongings stored for a short period of time if at all; Few or no shelter or service referrals provided; Regulatory or physical barriers to secure the site of the former encampment and keep it from being reoccupied
- 2) **Clearance with Support:** Notice of pending sweeps provided weeks in advance, often by trained outreach workers who have experience working with people experiencing unsheltered homelessness; Longer term storage of belongings available; Referrals to shelter or services provided by outreach workers, who also accompany the first responders and sanitation crews who clear encampments
- 3) **Tacit Acceptance:** Encampments allowed to persist regardless of whether laws or ordinances explicitly authorize or prohibit their existence; Longer term storage of belongings available; Basic services or infrastructure provided, in particular to address public health and sanitation concerns (for example, portable toilets, showers, and potable water); Outreach workers may visit the encampment to provide referrals to permanent housing, shelter, and services
- 4) **Formal Sanctioning:** Encampments permitted by law or ordinance on public and or privately owned property, usually only in designated locations, may have established rules that govern the size, location, or duration of encampments; May have a public agency or nonprofit organization manage encampments, infrastructure and public services—which may include laundry and potable water, common spaces for eating and meeting, lockers for storing belongings (including on a longer term basis), meal services and food donations, job training programs, access to mail and voice mail services—provided by the municipality and private or faith-based organizations and volunteers; May provide case management, including assistance applying for transitional or permanent housing and other benefits, appealing denials, and managing funds<sup>13</sup>

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<sup>12</sup> USICH (2015) Ending Homelessness for People Living in Encampments: Advancing the Dialogue

<sup>13</sup> HUD - Office of Policy Development and Research (2019) Understanding Encampments of People Experiencing Homelessness and Community Responses: Emerging Evidence as of Late 2018

USICH provided guidance to communities for addressing encampments and details four effective strategies and approaches for encampment resolution that include:

- 1) Preparation and Adequate Time for Planning and Implementation;
- 2) Collaboration across Sectors and System;
- 3) Performance of Intensive and Persistent Outreach and Engagement; and
- 4) Provision of Low-Barrier Pathways to Permanent Housing.<sup>14</sup>

The National Law Center on Homelessness and Poverty similarly found through its review of current research, case studies, relevant domestic and international laws and federal guidance that there are certain key principles and corresponding practices that are important for successful interventions to end encampments within communities. These principles are:

- **Principle 1:** All people need safe, accessible, legal place to be, both at night and during the day, and a place to securely store belongings— until permanent housing is found.
- **Principle 2:** Delivery of services must respect the experience, human dignity, and human rights of those receiving them.
- **Principle 3:** Any move or removal of an encampment must follow clear procedures that protect residents.
- **Principle 4:** Where new temporary legalized encampments are used as part of a continuum of shelter and housing, ensure it is as close to possible to fully adequate housing.<sup>15</sup>

Additionally, both USICH and HUD have historically taken a strong stance against the criminalization of homelessness. HUD has emphasized that individuals experiencing homelessness should be afforded the same dignity, compassion, and support provided to others, and that criminalization policies further marginalize persons experiencing homelessness, provoke negative public attitudes and reactions to unhoused persons, and may even unduly restrict constitutionally protected liberties and violate international human rights obligations.<sup>16</sup> Additionally, HUD has found that policies criminalizing homelessness are neither in the best interest of persons experiencing homelessness nor the wider community:

*A growing body of research comparing the cost of homelessness, including the cost of criminal justice involvement, with the cost of providing housing to homeless people shows that housing is the most affordable option. With state and local budgets stretched to their limit, rational, cost-effective policies are needed – not ineffective measures that waste precious taxpayer dollars. So not only are these practices inhumane, they are short-sighted and ultimately not cost-effective.*

*Criminalization measures do not prevent or end homelessness; they only exacerbate existing problems. After people experiencing homelessness are arrested, they are returned to their communities, still with nowhere to live and now laden with financial obligations, such as court fees, that they cannot pay. Moreover, criminal convictions – even for minor crimes – can create*

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<sup>14</sup> USICH (2015) Ending Homelessness for People Living in Encampments: Advancing the Dialogue

<sup>15</sup> National Law Center on Homelessness & Poverty (NLCHP) (2017) Tent City USA: The Growth of America's Homeless Encampments and How Communities are Responding, [https://nlchp.org/wp-content/uploads/2018/10/Tent\\_City\\_USA\\_2017.pdf](https://nlchp.org/wp-content/uploads/2018/10/Tent_City_USA_2017.pdf)

<sup>16</sup> HUD Exchange (2016) Decriminalizing Homelessness, <https://www.hudexchange.info/homelessness-assistance/alternatives-to-criminalizing-homelessness/>

*barriers to obtaining critical public benefits, employment, or housing, thus making homelessness more difficult to escape.*<sup>17</sup>

USICH, in partnership with Department of Justice and HUD, have also outlined alternatives to the criminalization of homelessness and emphasized a human rights approach around the following solutions:

- **Solution I:** The creation of comprehensive and seamless systems of care that combine housing with behavioral health and social service supports have been shown to prevent and end homelessness.
- **Solution II:** Collaboration between law enforcement and behavioral health and social service providers results in tailored interventions that connect people with housing, services, and treatment and meet the community's goal of reducing the number of people inhabiting public spaces.
- **Solution III:** Implementation of alternative justice system strategies can reduce homeless involvement with the criminal justice system, decrease recidivism, and facilitate connection with other systems of care.<sup>18</sup>

It is important that San Diego understands national guidance and current understandings regarding best practices to address unsheltered homelessness and encampments.

#### **San Diego County Regional Policy Guidelines:**

The San Diego regional policy guidelines are divided into three categories: 1) Shared Vision and Position, 2) Services and Supports, and 3) Addressing Encampments. Each category includes specific policy guidelines to be adopted and followed by Stakeholders. These policy guidelines build on national guidance but reflect local input, dynamics, and structures.

#### **Policy Guidelines for Addressing Unsheltered Homelessness: Shared Vision and Position**

The following policy guidelines seek to create a shared vision and position on the issue of unsheltered homelessness. It is important for all Stakeholders regionally to be aligned around a shared vision that includes an understanding of the situation and most effective ways to address.

1. **Housing First Approach:** All key Stakeholders need to adopt and embrace a Housing First philosophy and approach. Housing First is a homeless assistance approach that prioritizes providing permanent housing to people experiencing homelessness, thus ending their homelessness and creating the circumstances through which they can pursue personal goals and improve their quality of life through voluntary supportive services.<sup>19</sup> Implementation of a Housing First approach, beginning with housing-focused outreach and engagement, is critical to making sustainable progress towards preventing and ending unsheltered homelessness in San Diego County.

<sup>17</sup> HUD (2014) SNAPS In Focus: The Case Against Laws That Criminalize Homelessness, <https://www.hudexchange.info/news/snaps-in-focus-the-case-against-laws-that-criminalize-homelessness/>

<sup>18</sup> USICH (2012) Searching Out solutions: Constructive Alternatives to the Criminalization of Homelessness, [https://www.usich.gov/resources/uploads/asset\\_library/Searching\\_Out\\_Solutions\\_2012.pdf](https://www.usich.gov/resources/uploads/asset_library/Searching_Out_Solutions_2012.pdf)

<sup>19</sup> NAEH (2016) "What is Housing First?", <http://endhomelessness.org/wp-content/uploads/2016/04/housing-first-fact-sheet.pdf>

- 2. Regional Engagement and Collaboration:** Addressing unsheltered homelessness cannot successfully be done by one Stakeholder alone. Stakeholders need to be engaging with, collaborating, and communicating with federal, state, and regional partners for progress to be made. This includes acknowledging regional disparities in access to services and populations in need. Stakeholders should work to identify these regional disparities in access to critical services for those living unsheltered, such as street outreach services and shelter options, and develop a collaborative response for addressing them.

It is also vital that a regional unsheltered outreach coordination model be developed to help decrease duplication of street outreach and other efforts and ensure individuals experiencing unsheltered homelessness are identified, assessed, and engaged in services in a coordinated and trauma informed manner. The large-scale, cross-provider coordination of outreach efforts can be achieved through the designation of a centralized entity to guide regional outreach activities. Such an entity can determine how to deploy resources in the most effective manner; track results of outreach efforts for continual process improvement; offer system-level, ongoing training opportunities; and ensure that outreach teams can easily share information with one another across agencies. This would allow for new strategic approaches to outreach in San Diego County, such as allowing outreach workers to undertake a concerted effort in a particular region in response to an emerging need and allowing teams to have a sustained focus in specific neighborhoods to help build rapport. This entity could also provide a central point of contact that agencies or members of the public might use to alert trained outreach workers to people or encampments in need of contact and services as opposed to calling law enforcement to respond.

- 3. Address the Affordable Housing Crisis:** Homelessness, especially unsheltered homelessness, is largely driven by a lack of affordable housing options throughout the region.<sup>20 21</sup> The most effective way to address unsheltered homelessness is through the provision of a permanent stable home with appropriate ongoing support. To address unsheltered homelessness, affordable housing is greatly needed; more specifically, housing with the appropriate level of supportive services in the form of case management, income and employment services, behavioral health treatment which includes mental health and substance use disorder services, healthcare services, and life skills supports is critical for maintaining housing stability. Permanent supportive housing - defined as subsidized affordable housing with wrap-around supportive services to meet the needs of homeless individuals who are the hardest to serve - is a national evidence-based practice and has been shown to be an effective solution for chronic homelessness.<sup>22</sup> Stakeholders and the general public at large needs to support the creation of affordable and permanent supportive housing in their jurisdictions.

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<sup>20</sup> National Alliance to End Homelessness (2018), "Exploring the Crisis of Unsheltered Homelessness," <https://endhomelessness.org/exploring-crisis-unsheltered-homelessness/>

<sup>21</sup> Andrew Khouri, Los Angeles Times (June 13, 2018), "High cost of housing drives up homeless rates, UCLA study indicates," <https://www.latimes.com/business/la-fi-ucla-anderson-forecast-20180613-story.html>

<sup>22</sup> Ann O'Hara (January 2003), "Permanent Supportive Housing: A Proven Solution to Homelessness," Technical Assistance Collaborative (TAC) and the Consortium for Citizens with Disabilities (CCD) Housing Task Force, *Opening Doors* Issue 20, <http://www.tacinc.org/media/13714/PSH%2020.pdf> and U.S. Department of Health and Human Services, Substance Abuse and Mental Health Services Administration (2010), "Permanent Supportive Housing: How to Use the Evidence-Based Practices KITS", HHS Pub. No. SMA-10-4509,

4. **Respectful, Person-Centered, and Trauma Informed Approach:** All efforts and interactions by Stakeholders and the general public are to be respectful, compassionate, patient, and driven by empathy for the individual's situation. Interactions such as calls for public services should be coordinated with available outreach and services programs whenever possible and should be focused on assisting the individual to resolve their homeless situation in a manner that is respectful, dignified, trauma informed, and supportive while at the same time meeting the needs for public safety and health. The personal space, time, and property of persons in unsheltered situations should be respected during all interactions, including respect for the rest and comfort of individuals encountered during outreach and other interactions. System level training and certification opportunities should be made available to relevant staff and outreach personnel across the region on topics including Trauma Informed Care, Motivational Interviewing, Crisis Intervention and Mental Health First Aid.
5. **Alternatives to the Criminalization of Homelessness:** All Stakeholders should seek to not criminalize homelessness. With not enough temporary and permanent housing options to meet demand, individuals have limited options and may have no other choice but to live outside or in their vehicles. Laws that limit activities such as sitting, sleeping outside or in vehicles, or eating in public spaces may unfairly target people living on the streets. In the absence of adequate shelter alternatives or private places to perform those activities, people have the right to undertake these activities in public, and local ordinances should reflect that.

At the same time, Stakeholders should conscientiously and compassionately navigate respecting the rights of individuals experiencing unsheltered homelessness while responding to community needs for safe streets, healthy neighborhoods, and responsible behavior and acknowledging the need for law enforcement to address serious criminal activity that threatens public safety. However, citations and arrests for low-level quality of life infractions such as sleeping or resting outdoors or in a vehicle, loitering, or jaywalking are traumatizing for people experiencing homelessness and impede progress towards exiting homelessness by impacting employment and housing options, access to education, and family stability.<sup>23</sup> Municipalities need to review current local laws and consider amending as necessary to develop and implement constructive alternatives to criminalization in response to unsheltered homelessness with the support of local law enforcement. This should include an evaluation of current local laws that disproportionately impact individuals for whom their only form of shelter is in their vehicle. The RTFH and local municipalities should also work with law enforcement and public agencies to identify best practices for constructively addressing public health and public safety concerns resulting from unsheltered homelessness.

6. **Address Racial Disparities:** Understanding that persons of color, especially African Americans, are overrepresented in the unsheltered homeless population compared to the general population, Stakeholders should strive to make homeless response services, resources, and

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Rockville, MD: Center for Mental Health Services, <https://store.samhsa.gov/product/Permanent-Supportive-Housing-Evidence-Based-Practices-EBP-KIT/SMA10-4510>.

<sup>23</sup> National Law Center on Homelessness & Poverty (2018), "Fact Sheet: The Top Five Ways Criminalization of Homelessness Harms Communities", <https://nlchp.org/wp-content/uploads/2018/10/criminalization-one-pager.pdf>.

personnel as reflective as possible of those experiencing unsheltered homelessness, responsive to their unique needs and challenges, and equitable across racial and ethnic identities.

Providers and agencies working with individuals experiencing unsheltered homelessness should have access to comprehensive and frequent staff training opportunities on topics including cultural competency, cultural humility, implicit biases, and racial equity. These training opportunities should be made available and tailored to law enforcement officers who work with individuals experiencing unsheltered homelessness, as well as information on the intersection of race, homelessness, and criminal justice involvement and best practices on addressing racial inequities through law enforcement processes. Providers and agencies should also analyze existing policies and processes to ensure that they do not create unintentional barriers for people of color experiencing unsheltered homelessness to access, engage, and remain connected to housing and/or services.

7. **Vehicular Habitation:** Among the population of persons experiencing unsheltered homelessness in San Diego County is a substantial population of persons for whom their only form of shelter is their vehicle. San Diegans who reside in their vehicle have expressed that vehicle habitation is safer than residing on the street and more accommodating than residing in shelters that are often inaccessible or unaccommodating to persons with disabilities.<sup>24</sup> Vehicular habitation is targeted by a number of local ordinances and can result in ticketing, the impounding of vehicles, and even arrest, placing an undue burden on persons for whom their vehicle is their only form of shelter. It is important that constructive policies to address vehicular homelessness and provide support for this particular unsheltered population be established for the region. Stakeholders should work together and look to best practices from other communities to develop solutions and implement protections for persons experiencing vehicular homelessness.

### **Policy Guidelines for Addressing Unsheltered Homelessness: Services and Supports**

The following policy guidelines seek to provide guidance on the provision of services and supports for those experiencing unsheltered homelessness.

1. **Access to Basic Services:** Key Stakeholders should strive to ensure that individuals have access to basic necessity services that reflect human dignity. Stakeholders should arrange for, through the help of regional partners, adequate access to basic services, including access to clean and safe restrooms with hand washing stations and shower facilities; hygiene and sanitary supplies; trash disposal services; laundry services, and storage facilities. Adequate access to basic services includes ensuring that these services are provided in full across the geographic region in locations that are convenient to persons experiencing unsheltered homelessness and accessible to individuals with disabilities, and accessible well beyond weekdays and traditional business hours. Increased access to shelter and temporary housing options across San Diego County can help ensure that these basic needs are met.

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<sup>24</sup> Bianca Bruno, Courthouse News Service (October 12, 2018), "Homeless San Diegans Lead National Fight of Vehicle-Camping Laws," <https://www.courthousenews.com/homeless-san-diegans-lead-national-fight-of-vehicle-camping-laws/>

2. **Coordinate with Outdoor Meal Programs:** Stakeholders should support coordination between appropriate departments and agencies – including existing non-profits who have obtained a public health certificate - with outdoor meal programs and volunteer groups seeking to provide meals to those living unsheltered so that such meal programs operate in a safe, sanitary, and effective manner and to ensure proper trash disposal of food waste. Outdoor meal programs should ensure that they comply with AB 2178, which provides health and safety guidelines for charitable feeding operations. Outdoor meal programs also provide an opportunity and venue for cross-provider outreach coordination and client engagement with program participants who are experiencing unsheltered homelessness.
3. **Outreach and Engagement:** Outreach and engagement to individuals living unsheltered should primarily be led by non-law enforcement homeless outreach specialists focused on making connections to housing and services, however supported by law enforcement personnel in providing coordination, support and safety when addressing unsheltered homelessness as necessary or requested. Strong partnerships among homeless services personnel and law enforcement is critical for success, as law enforcement officers are often the first point of contact persons experiencing unsheltered homelessness have with outreach and engagement services.

Outreach and engagement should focus on swiftly connecting individuals experiencing unsheltered homelessness to shelter or housing and services that are appropriate to their needs, including physical and mental health needs, through persistent and compassionate outreach and engagement efforts. These efforts should strive to meet unsheltered persons where they are, with more services and options provided during street outreach when possible to support swift assistance and engagement without expectations of navigating the homeless response system right away.

Stakeholders should develop pathways for members of the public to reach outreach teams or a centralized outreach entity in real time to efficiently connect individuals experiencing unsheltered homelessness to appropriate resources. Public education materials should also be developed to support citizens in reporting homelessness-related concerns to the appropriate responding agency in non-emergency situations.

**Definition of Street Outreach:** Street outreach is a professional homeless services intervention that focuses primarily on supporting individuals with accessing permanent or temporary housing by building trusting relationships and ongoing rapport. Street outreach seeks to engage individuals living unsheltered in a culturally competent and trauma informed manner, provide links to mainstream services, and use diversion and problem solving techniques to connect people with safe housing options whenever possible. The primary and ultimate goal of street outreach is to find affordable housing for each individual, with access to voluntary wraparound services needed to stay healthy, including employment, substance use treatment and mental health care. While this is ideally accomplished quickly, outreach often requires time and interactions with individuals experiencing unsheltered homelessness therefore should not be seen as one-time engagements. Rather, each interaction should be seen as an opportunity for

outreach staff to build a relationship and help people work toward making a connection to housing and services. Key to the success of outreach and engagement efforts is regular follow-up and building trust with clients through regular interactions, including learning about the client's current social network and supports.

All Stakeholders providing funding for outreach services in their jurisdiction should adopt this definition.

4. **Regional Deployment of Outreach Services:** The RTFH, County and all other outreach providers should ensure that street outreach resources they fund will be deployed regionwide in all eighteen cities throughout San Diego County and in the unincorporated areas, and should work with municipalities to communicate and notify when outreach services are provided in their jurisdictions. The RTFH, County and all other outreach providers should distribute and deploy outreach services proportionately based on numbers of homeless persons identified through the annual PIT Count as well as new areas identified as high concentrations through other data-informed methods. The RTFH and the County will work to overcome existing barriers to deploying outreach to all eighteen cities in the region.
5. **Temporary Housing Facilities and Programs:** Due to limited permanent housing options available for people experiencing homelessness in San Diego County, supporting rapid exits from the streets may require a brief stay in a temporary setting while a permanent housing situation is identified. Temporary settings may include a shelter, hotel or motel, safe parking lot, recuperative care, temporary rental assistance, or other temporary housing settings. Recognizing that temporary housing options are limited as well, municipalities, along with the RTFH and County, should evaluate the need for temporary options in their community and if needed, support low-cost options for the creation or expansion of temporary shelter beds, including the use of unused buildings, low-cost temporary structures, partnerships with the faith-based community, hotel or motel vouchers, underutilized public or non-profit/church parking lots, or repurposing of transitional housing to more adequately target temporary housing needs and reflect client choice while awaiting permanent housing options.<sup>25</sup> To meet the needs of persons in unsheltered situations through temporary housing programs, temporary housing facilities and programs should operate high quality, decent, and humane facilities that use a low-barrier approach that includes not requiring individuals to be clean or sober, engage in services, leave their pets, leave their partners, have a source of income, and other barriers to housing and service engagement.

Additionally, Stakeholders should ensure that shelters are meeting their obligations under the Fair Housing Act (FHA), Section 504 of the Rehabilitation Act of 1973 (Section 504), and the Americans with Disabilities Act (ADA) and make reasonable accommodations for persons with disabilities as required.

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<sup>25</sup> Funders Together to End Homelessness (2013), "Refocusing and Retooling Transitional Housing," HEARTH Brief, <http://d3n8a8pro7vhmx.cloudfront.net/funderstogether/pages/271/attachments/original/1389018171/HEARTH-Brief-Refocusing-and-Repurposing-Transitional-Housing.pdf?1389018171>

6. **Peer Support:** Peer support encompasses a range of activities and interactions between people who share similar lived experiences, including experiences of homelessness, military service, mental health conditions, and substance use disorders, among others.<sup>26</sup> Outreach teams and service providers should identify opportunities to hire individuals with lived homelessness experience to provide peer support, including helping to identify and engage individuals living in unsheltered situations and utilizing their shared experiences to build trusting relationships with clients. Individuals with lived experience, including those whose only form of shelter is their vehicle and those residing in encampments, need to be continuously involved in the development, implementation, and evaluation of San Diego County’s regional unsheltered policies.
7. **Housing Ready Perspective:** Street outreach services should employ a perspective that all unsheltered individuals are currently housing ready, meaning that all individuals will be receptive of housing and services when offered in a fashion that best meet their needs without any preconditions. Outreach personnel should help remove barriers to housing for persons experiencing unsheltered homelessness by assisting clients in obtaining identification, providing resources or referrals to address concerns regarding background checks and evictions, and providing other support as needed to make the transition into housing as seamless as possible once an individual accepts the offer of housing and services.

However, for some individuals it may take longer to agree to housing and services, and Stakeholders need to respect that longer engagement may be needed. For individuals who may be initially hesitant to engage in services, it is the role of the street outreach personnel to assertively engage people and be persistent in continuing to develop trust and rapport, and to be there with available housing resources when individuals are ready. It is also important that outreach personnel support clients in addressing the needs they identify as most urgent, which may include basic needs, health or mental health care, employment, and income supports or legal services, among others.

8. **Strategies for Reaching Disengaged Populations:** Some individuals experiencing unsheltered homelessness have had negative experiences with shelters or the homeless response system or face challenges related to serious mental illness or substance use disorders, resulting in disengagement from outreach and engagement efforts. Outreach personnel should be trained on assertive engagement, a process in which outreach personnel use their interpersonal skills and creativity to create a more conducive environment and circumstances for client engagement.<sup>27</sup> Assertive Engagement is a synthesis of evidence-based practices including Motivational Interviewing, Strength-Based Practice, and Assertive Community Treatment and incorporates concepts around trauma informed care, harm reduction, anti-oppression, and unconditional positive regard to create opportunities for meaningful engagement.<sup>28</sup>

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<sup>26</sup> U.S. Department of Health and Human Services (HHS), Substance Abuse and Mental Health Services Administration (SAMHSA) (2017). Value of Peers. [https://www.samhsa.gov/sites/default/files/programs\\_campaigns/brss\\_tac/s/value-of-peers-2017.pdf](https://www.samhsa.gov/sites/default/files/programs_campaigns/brss_tac/s/value-of-peers-2017.pdf)

<sup>27</sup> Iain De Jong, OrgCode (September 2011), “Appropriately Using Assertive Engagement,” [https://www.orgcode.com/appropriately\\_using\\_assertive\\_engagement](https://www.orgcode.com/appropriately_using_assertive_engagement)

<sup>28</sup> Multnomah County Department of County Human Services, “Assertive Engagement,” <https://multco.us/file/66815/download>

Expanded access to behavioral health services, including improved coordination of mental health outreach services through the PERT Team, HOT Team, and other social service non-profit outreach teams to reach those in need throughout the County, can help can engage individuals for whom behavioral health needs create a barrier to engagement.

For individuals who express that they are not yet ready to pursue services or temporary or permanent housing options or who express an explicit desire to remain in their current unsheltered situation, it is important that outreach personnel respect their wishes while continuing to offer access to basic needs services to ease their unsheltered experience. Ensuring programs operate with the lowest possible barriers alongside intensive case management and comprehensive voluntary supportive services can encourage people to consider engaging in services and remain engaged once connected.

9. **Services Targeted to Most in Need:** Street outreach services should be solution-focused, targeted to those individuals identified as most in need, and focused on assisting individuals with obtaining a permanent or temporary housing resolution as quickly as possible. Street outreach services should also target those most in need of more intensive services, encompassing case management and navigation services and be provided over a longer duration to a smaller group of individuals focused on housing placement. Case management involves the delivery of individualized services to meet the needs of clients and may include counseling, developing individualized housing and service plans, coordinating services and public benefits, enhancing life skills, addressing health and mental health needs, and providing income supports, among other individualized needs. Navigation services assist individuals experiencing unsheltered homelessness in overcoming barriers to accessing housing and services through supports such as housing search and documentation assistance. Street outreach personnel are well positioned to identify those individuals most in need and provide a warm handoff to service providers who can provide these more intensive services.

Street outreach services will still be provided to a broader population of unsheltered individuals (contact-based outreach), however more intense and ongoing services are provided to a smaller subset of those in greatest need (solution-focused outreach). Street outreach personnel should also ensure that youth experiencing homelessness are able to attain appropriate and responsive outreach services, as they may not experience the same levels of chronicity or vulnerability as adults experiencing homelessness.

10. **Definition of Most in Need:** Stakeholders should adopt the definition of “those is most need,” as defined in the approved 2018 RTFH Coordinated Entry System (CES) Policies and Procedures as outlined below:

*Housing priority is determined according to the Service Entry Priorities outlined in the CoC Community Standards, as below:*

*Chronically homeless individuals, youth and families with:*

1. *The longest history of experiencing homelessness and the most needs*
2. *The longest history of experiencing homelessness*

3. *The most needs, particularly mental illness or substance use disorder*
4. *All other: Non-Chronically homeless individuals, youth and families*

RTFH further defines “Those with the most needs,” as households with a diagnosed serious mental illness, substance use disorder, children under the age of four, or adults with a documented qualifying medical condition (including terminal illness; condition requiring the use of substantial medical equipment, such as an oxygen tank or kidney dialysis machine).

In addition to using the definition set forth by the RTFH for those in most need, key Stakeholders may also take into consideration individuals experiencing unsheltered homelessness who are high utilizers of costly public resources such as healthcare or the criminal justice system. Those with high utilization of public resources will also be determined as those in the most need and will be prioritized for services tailored to those specific needs. RTFH, in coordination and with the assistance of local municipalities, will coordinate with health and criminal justice partners to determine high utilizers.

11. **Homeless Management Information System:** Street outreach workers will utilize the Homeless Management Information System (HMIS) to input demographic and service data that enables the community to make data-driven improvements to the street outreach approach and to address the needs of the unsheltered population. The collection of this data can assist Stakeholders with addressing racial disparities, locating and identifying those in most need, and tracking public costs and successful outcomes in placing individuals into permanent housing. Regular analysis of the data can be provided to Stakeholders to help improve and inform program practices.
12. **Coordinated Entry System:** Full participation of street outreach in the region’s CES is expected and outreach services should use a By Name List to prioritize and target individuals for services and manage caseloads. CES and By Name List are defined as:
  - a. *Coordinated Entry System:* A national best practice and HUD required activity that ensures a coordinated, systemic process for how the community provides access for individuals and families who are at-risk or currently experiencing homelessness to the homeless system, how individuals receive a standardized assessment of their needs, how resources are prioritized, and how individuals and families are referred for housing and supportive services.<sup>29</sup> In San Diego, the RTFH is responsible for oversight and coordination of San Diego County’s CES.
  - b. *By Name List:* List of names of individuals and families currently experiencing homelessness generated through the CES which provides important information such as: identifying who is experiencing homelessness in a given region, basic demographics, acuity scores from their CES Assessment, and recommended housing intervention. The list is prioritized based on acuity scores from the CES assessment and other factors to

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<sup>29</sup> Building Changes, “Coordinated Entry,” <https://buildingchanges.org/strategies/coordinated-entry> and U.S. Department of Housing and Urban Development (June 2017), “Coordinated Entry Core Elements,” <https://files.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf>

determine those most in need and recommend the most appropriate housing intervention for each client.

### **Policy Guidelines for Addressing Unsheltered Homelessness: Addressing Encampments**

The following policy guidelines provide guidance for addressing homeless encampments. For the purposes of these guidelines a homeless encampment is a location in which tents or other hand-built structures occupied by individuals experiencing homelessness are on public or private property.

1. **Clearance with Support:** For addressing encampments, key Stakeholders should adopt a clearance with support framework, which understands encampments need to be abated and closed for public health and safety reasons, but ensures that intense services, supports, and offers of assistance, including temporary and permanent housing options and storage opportunities, are offered well in advance of closure by non-profit street outreach workers. Encampment abatements will be conducted only at the conclusion of a multi-disciplinary assessment that includes evaluation from street outreach personnel and other Stakeholders to ensure that all avenues of providing assistance and supports have been exhausted and thus the encampment is appropriate for closure. This evaluation should include an assessment of how many individuals residing in the encampment have been connected to temporary or permanent housing options and assurance that all remaining encamped individuals are being connected to focused outreach, engagement and transition planning to prevent their displacement when the encampment is resolved. This evaluation should also include feedback from Stakeholders such as fire-rescue, the Department of Public Health and the Department of Public Works to determine a protocol and timeline for waste management and debris removal based on the state of the encamped site.
2. **Coordination with Property Owners as Appropriate:** In the event that an encampment is on private property, Stakeholders need to take necessary steps and coordinate activities with the property owner. In addition, if encampments are on state owned or other non-local public land, Stakeholders need to coordinate with appropriate state or other government entity.
3. **Multi-Disciplinary Approach:** Stakeholders should use a multi-disciplinary approach that includes the RTFH, County, contracted non-profits, law enforcement, and other necessary departments for addressing homeless encampments. The approach should be focused on diversion and problem solving, offering support and services including temporary housing, permanent housing, storage, and working positively with those living in encampments prior to the closure of the encampment and subsequent abatement by building trust and rapport. Many individuals living in encampments may have acute health and behavioral health issues, specifically substance use disorders, and Stakeholders should coordinate with the County for providing health and behavioral health services and supports as part of encampment resolutions. The County will strive to ensure the provision of adequate levels of behavioral health support to those residing in encampments based on need.

4. **Assess and Prioritize Based on Need:** When addressing encampments, Stakeholders should assess encampments for needs, prioritizing specific encampments based on risk which include health, safety, and the vulnerability of populations residing in them.
5. **Temporary Housing Options:** Stakeholders should strive to dedicate temporary options to assist those transitioning out of encampments successfully. If an individual living in an encampment is living in a municipality that has available access to available temporary shelter or other temporary options and has agreed to utilize that resource, the encampment cannot be closed and abated (unless for health or safety reasons) until the temporary placement has been arranged and is completed.

Additionally, individuals residing in encampments may avoid traditional shelters and other temporary housing options due to previous negative experiences with high barrier policies and approaches. Such experiences may include being denied admission with pets, lack of storage for personal possessions, separation from partners, and being turned away or having assistance terminated due to substance use or other behavioral health issues. Stakeholders should address these common reasons for shelter avoidance through low-barrier approaches and message their policy changes to individuals residing in encampments during outreach and engagement efforts.

6. **Individualized Encampment Strategies:** Factors such as where an encampment is located, the number of people residing in the encampment and the characteristics of people encamped may require the involvement of different Stakeholders and the utilization of different approaches for encampment resolution and abatement. The timing of outreach and enforcement efforts to encamped individuals is also critical to avoid displacing individuals to other areas of the community prior to connecting them to services.
7. **Seek to Repurpose and Secure Space:** Stakeholders should develop strategies for repurposing or securing the space where the encampment was located, as appropriate, so as not to have unsheltered individuals return to the location and revive the encampment. Securing the space may involve in-depth debris and hazardous materials removal and implementation of measures such as fencing or landscaping to prevent re-encampment. Once the site is secured, it should be turned back over to the appropriate entity to provide ongoing management.