

UNSHELTERED HOMELESSNESS POLICY FOR THE SAN DIEGO CONTINUUM OF CARE

MAY 2025

PURPOSE

The Unsheltered Homelessness Policy provides guidance on a shared vision and approach for addressing the needs of individuals experiencing unsheltered homelessness, including those living in vehicles, those residing in encampments, and those that are rough sleeping.

This Policy covers the San Diego Continuum of Care (CoC), including all 18 municipalities and unincorporated County areas.

The Policy is intended to:

- inform funding acquisition and allocation decisions related to unsheltered homelessness response
- guide the work of organizations and entities directly involved with unsheltered people
- influence the response to:
 - encampments
 - vehicular habitation
 - rough sleeping
- help frame future advocacy efforts

POLICY

The San Diego region, through its CoC, affirms a bold and unwavering commitment to ending unsheltered homelessness through a unified, housing-focused, and equity-driven response. We believe that no one should have to live outdoors, in vehicles, or in places not meant for human habitation, and we are determined to change that reality with urgency, compassion, and accountability.

Our regional policy emphasizes a trauma-informed, person-centered approach that prioritizes permanent housing paired with voluntary support services as the cornerstone of our response. We reject punitive and ineffective approaches like displacement without alternatives, and instead champion humane, coordinated, and data-informed solutions. Encampments, vehicular habitation, and rough sleeping must be addressed with pathways to housing, health, and stability, as well as safe and appropriate interim options like shelter.

This work requires sustained public investment, interagency cooperation, cross-sector leadership, and measurable results. We commit to shared accountability and transparency in service delivery, policy implementation, and outcomes tracking, ensuring that our response to unsheltered homelessness is effective, equitable, and above all, dignified.

SHARED BELIEFS IN OUR RESPONSE TO UNSHELTERED HOMELESSNESS

Housing orientation

We believe in prioritizing access to permanent housing without preconditions, paired with voluntary, person-centered support services. Housing is a human right, not a reward for compliance. Housing is the only known cure to homelessness, when paired with appropriate support services.

Person-centered

We believe engagement and support services should be empathetic, respectful, and dignified. We see the whole person and leverage their strengths and resilience in the process of collaborating on housing solutions and interim options. We empower people to make decisions that impact them and value autonomy when capable of making informed decisions.

Trauma-informed

Services must be delivered in ways that recognize the trauma of homelessness and support healing, autonomy, and individualized pathways to stability. We actively resist retraumatizing people. We believe that emotional, physical, and mental safety are critical, and that trust is developed through rapport and transparency. Furthermore, we consider the cultural, historical and gender impacts on experiences of trauma. Finally, we engage in a manner that promotes mutuality and collaboration, empowering people to make decisions that directly impact them, when cognitively capable of doing so.

Effectiveness and continuous improvement

Street outreach services must be aligned to best and promising practices, and help realize results of connection to shelter, other resources, and housing. We embrace a culture of continuous improvement, always striving to get better in realizing a San Diego region where unsheltered homelessness is significantly rarer than the current reality.

Regional coordination and collaboration

A unified, cross-sector response, spanning municipalities, street outreach providers, other homeless service providers and housing organizations, funders, law enforcement, and healthcare, is essential. Shared goals and data (with consent) and aligned street outreach strategies are needed to reduce fragmentation. Furthermore, we believe that no one part of the San Diego CoC service area is solely responsible for resolving unsheltered homelessness independent of the co-operation and assistance of all other areas of the region. Resolving unsheltered homelessness is a shared responsibility, as people experiencing homelessness traverse municipal boundaries.

Health and safety

Constructive, health and safety-oriented strategies that reduce harm and connect people to housing and support services are necessary, and yield better results in resolving homelessness than punitive, arbitrary and/or unsustainable approaches like sweeps of encampments without extensively offering alternatives. We believe the response to unsheltered homelessness must consider the health and safety of all interested and affected parties, including people experiencing unsheltered homelessness, street outreach providers, businesses and the housed public. Furthermore, we believe in safer environments where there is less risk of violence, theft, spread of potential disease, pest infestations, and materials used for consuming substances.

Data-driven decision-making

Using data, By-Name Lists, and outcome tracking informs actions, prioritization of resources, and informs continuous improvement. We are dedicated to the use of HMIS across the region wherever possible and legal to allow for sharing of information and monitoring trends and performance. Data is used on a frequent basis to monitor trends and inform improvements in service delivery. Comprehensive data is also used to explain what is occurring, moving away from anecdotes or small samples used to generalize conclusions.

Accountability

Shared accountability among all parties providing direct services, funding direct services, and creating policies/procedures that shape the response to unsheltered homelessness, is vital for lasting impact. Moreover, we are accountable to people experiencing unsheltered homelessness throughout the San Diego region. We believe in being transparent with aggregate data, in accordance with all privacy legislation, to publicly share our collective progress. Through the contracting and monitoring process, accountability is formalized for those delivering direct services to people experiencing homelessness, to boards and elected bodies that approve funding and policies, and to taxpayers.

DEFINITIONS

Unsheltered homelessness

Outlined as part of the US Department of Housing and Urban Development's *Category 1* definition of homelessness, unsheltered homelessness is defined as:

"Individuals or families with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings." (HUD Regulation 24 CFR Part 91)

This includes locations such as streets, parks, vehicles, abandoned buildings, and transit stations. To meet the definition of unsheltered homelessness a person need not have a tent or occupy any other form of structure unfit for permanent human habitation.

Street outreach

Street outreach is a professional homeless services intervention that focuses primarily on supporting individuals with accessing permanent or temporary accommodation 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 permanent housing options whenever possible. The penultimate goal of street outreach is to find safe, appropriate and financially sustainable housing for everyone, with access to voluntary wraparound services as needed.

Shelter

A shelter can be any facility where the primary purpose is to provide temporary accommodation for people experiencing homelessness generally, or for a specific subset of the homeless population (e.g., a youth shelter). To meet the definition of a shelter, the temporary occupants cannot be required to sign leases or occupancy agreements. Most shelters are operated by non-profit organizations with professionally trained staff who serve people in a culturally competent and trauma-informed manner, provide links to mainstream services, and use diversion and problem-solving techniques to connect people with permanent housing options whenever possible. The penultimate goal of street outreach is to find safe, appropriate and financially sustainable housing for everyone, with access to voluntary wraparound services as needed.

Safe parking

Safe parking provides designated, secure parking lots for individuals and families experiencing homelessness who are living in their vehicles. These sites offer a safe place to park overnight and access

to supportive services aimed at helping participants transition into permanent housing. Amenities at these locations typically include restrooms, handwashing stations, security, and case management services.

Safe sleeping

Safe sleeping offers supervised, lower-barrier tent encampments as an alternative to unsanctioned street camping for individuals experiencing unsheltered homelessness. Operated on city-owned properties, these sites provide residents with tents, meals, restrooms, showers, 24-hour security, and access to supportive services such as housing navigation and transportation assistance. The program accommodates individuals, couples, and households, allowing pets and personal belongings, and is designed to serve those who may not engage with traditional congregate shelters. Enrollment requires a referral through the city's Coordinated Street Outreach Program, the San Diego Police Department, or by calling 2-1-1, as walk-ups are not permitted. By offering a structured environment, the Safe Sleeping Program aims to provide a pathway toward permanent housing solutions for unsheltered individuals.

Encampment

For the purposes of this policy, an encampment is defined as any location on public property where individuals experiencing homelessness reside in tents, vehicles, makeshift shelters, or other improvised structures not intended for permanent human habitation and without authorization from an appropriate body. Encampments vary in size and structure, and may be occupied by an individual or a group. Most often, encampments lack appropriate sanitation, lack the ability to safely store and prepare food, and do not provide the opportunity to safely store belongings. The policy acknowledges that while encampments reflect a lack of adequate shelter and housing options, they pose health, safety, and environmental risks that require a coordinated, humane, and housing-focused response.

Rough sleeping

Rough sleeping is the condition of sleeping in outdoor or public spaces not meant for human habitation such as sidewalks, parks, doorways, underpasses, beaches, or other exposed areas, without shelter, tents, or vehicular cover. Rough sleeping represents the most visible and acute form of unsheltered homelessness, often involving significant exposure to weather, trauma, health hazards, and personal safety risks. In the context of this policy, it signals an urgent need for trauma-informed, person-centered outreach and lower-barrier pathways to housing and support services.

Vehicular habitation

Vehicular habitation is the use of a vehicle such as a car, van, RV, or truck as a primary place of shelter or residence by individuals, couples or families experiencing homelessness. Vehicular habitation often arises when individuals have no access to conventional shelter or housing but retain a vehicle as their only form of refuge. While offering some privacy and mobility, vehicular habitation poses challenges related to legality, sanitation, safety, and access to services. The policy recognizes vehicular habitation as a form of unsheltered homelessness.

CONTEXT

18 Municipalities and Unincorporated County Areas

The San Diego CoC spans 18 municipalities and the unincorporated areas of San Diego County, encompassing urban, suburban, and rural geographies with varying resources, ordinances, and

demographics. Individuals experiencing unsheltered homelessness move fluidly across jurisdictional boundaries in search of safety, resources, or community. As such, addressing unsheltered homelessness requires a unified regional strategy that is adaptable to local contexts while maintaining shared principles, goals, and practices. No single jurisdiction can address this crisis in isolation. Collective commitment and shared responsibility are essential.

Local Ordinances, State Intentions and National Permissiveness to Criminalize Unsheltered Homelessness

Throughout the San Diego region, municipal ordinances vary in how they regulate public space use, including activities such as sleeping, resting, or residing in vehicles. These local policies often reflect attempts to manage health, safety, and quality-of-life concerns in public areas. In contexts where shelter or housing options are limited or unavailable, enforcement of such ordinances often affect individuals experiencing unsheltered homelessness.

At the state level, California has introduced model ordinances and policy guidance aimed at regulating encampments, particularly in sensitive areas such as near schools, parks, and transit facilities. While these policies are designed to address public health and safety, they also raise considerations about how best to respond when there are insufficient housing or shelter alternatives available.

Nationally, legal and policy frameworks around unsheltered homelessness continue to evolve. Key court cases, including the *Johnson v. Grants Pass* decision, defined the extent to which local governments can enforce anti-camping laws when adequate shelter is not accessible, which has essentially made the criminalization of homelessness permissible.

Enforcement-based approaches, including citations or displacement from encampments, are one set of tools that jurisdictions use in managing unsheltered homelessness. However, these approaches are pointless and punitive with people who do not have funds to pay tickets. Any approach to enforcement must be considered alongside access to housing, supportive services, and shelter availability to ensure an effective and coordinated response. Moreover, there is not consistency between the various law enforcement entities operating within the catchment area of the CoC in how each respond to homelessness. Furthermore, there is not consistent coordination between law enforcement's efforts to eradicate encampments with the social service response, which is primarily street outreach.

The regional policy framework encourages municipalities and agencies to work toward coordinated and balanced strategies that consider the rights and needs of all parties, including people experiencing homelessness, residents, service providers, and public agencies.

Street Outreach Standards

The CoC, in partnership with the County of San Diego, the San Diego Housing Commission and the City of San Diego has developed and implemented street outreach standards that emphasize professionalized, person-centered, trauma-informed engagement. Any municipality funding street outreach services within the region are encouraged to apply the standards. Street outreach, as identified in the standards, is not simply a gesture of compassion or charity. Instead, street outreach is a targeted, housing-focused intervention. Effective outreach is persistent, culturally responsive, and housing-focused, aiming to connect individuals, couples and families to shelter, services, and permanent housing options. A

coordinated regional model, grounded in data and shared protocols, is essential to minimize duplication and ensure that individuals are not overlooked or repeatedly engaged without resolution.

Trends in Unsheltered Homelessness

Trends in unsheltered homelessness in the community reflect both urgent need and shifting dynamics. The latest Point-in-Time Count and other regional data show thousands of people living in cars, tents, and public spaces. There are a growing number of older adults, individuals with disabling conditions, and people who identify as Black, Indigenous, or other people of color disproportionately impacted. Long-term rough sleeping, the rise in vehicular habitation, and increasingly visible encampments underscore the need for a systemic and humane response that moves beyond crisis containment and into lasting solutions.

Shelter Capacity

Despite the efforts of many providers, shelter capacity remains insufficient to meet the scale and diversity of need across the region. Existing shelters vary in model and accessibility. Innovative efforts such as Safe Parking and Safe Sleeping programs are helping to close critical gaps, yet significant expansion of lower-barrier, housing-focused shelter is needed. Shelter must be reframed not as a destination but as a short-term intervention on the path to permanent housing. Furthermore, even with shelter capacity troubling, expansion of shelter cannot come at the cost of expansion of permanent housing with appropriate supports to help people exit homelessness permanently.

Inflow and Outflow

Understanding inflow and outflow is critical to disrupting the cycle of homelessness. Inflow occurs when individuals fall into homelessness due to evictions, institutional discharges, economic hardship, domestic violence, and other systemic vulnerabilities. Outflow occurs when people are supported to exit homelessness into safe, sustainable housing. A functional response system must balance these flows—investing in both prevention and diversion on the front end, and robust housing placement and retention supports on the back end. Data systems like the Homeless Management Information System (HMIS) and Coordinated Entry are essential tools for tracking these dynamics, guiding resource deployment, and measuring system performance.

RESPONSE TO UNSHELTERED HOMELESSNESS

Optimal Response: Engagement & Voluntary Resolution of Unsheltered Homelessness

An optimal response to unsheltered homelessness begins with a coordinated system of engagement that prioritizes relationship-building, respect, and voluntary pathways to housing and services. Outreach teams, led by professionals trained in the likes of in trauma-informed care, housing navigation, harm reduction, strengths-based approach, and benefits navigation, play a central role in identifying, engaging, and supporting individuals sleeping rough, in vehicles, or in encampments.

The goal of this engagement is to resolve homelessness through voluntary means whenever possible. This includes exploring diversion, facilitating connections to shelter or safe parking, and ultimately securing access to permanent housing options. Repeated, person-centered contact allows trust and rapport to develop over time, enabling individuals to consider services they may have initially declined. Persistence is also required given the intended resource (e.g., a shelter bed) is not always available at the

time a person expresses desire for the resource, and that if a person expresses interest in housing the housing is rarely immediately available and there are administrative processes to be completed prior to moving into housing.

Voluntary resolution efforts are strengthened by clear access points, lower-barrier program design, harm reduction approaches, and access to supportive services such as healthcare, behavioral health care, and income. Coordination between outreach, coordinated entry, shelter providers, and housing programs is essential for ensuring timely transitions from unsheltered status to safe, stable housing.

Voluntary resolution can be thwarted by enforcement to remove the rough sleeper, vehicle or encampment. If a person is displaced through these efforts, they can be difficult to relocate in a timely fashion to keep progressing towards shelter or housing goals. Furthermore, if a person experiences enforcement, even if the street outreach team is not involved, can erode trust.

The Roles of Non-Profit Street Outreach

Non-profit street outreach providers are often the frontline connection between individuals experiencing unsheltered homelessness and the broader system of housing, shelter, and other social supports. These providers engage individuals where they are (e.g., sidewalks, in vehicles, riverbeds, or encampments) offering consistent, trauma-informed support aimed at building trust and facilitating voluntary pathways out of homelessness. Outreach teams work to understand each individual's unique circumstances, assess immediate needs, and provide connections to shelter, income supports, and ultimately, permanent housing options.

Street outreach is not a one-time intervention. It is a progressive, relational process rooted in persistence, respect, and dignity. Non-profit outreach teams bring specialized training in motivational interviewing and de-escalation, making them well-suited to engage individuals who may be disconnected from formal systems of care or have had prior negative service experiences. Outreach efforts are most effective when embedded in a coordinated system that includes access to shelter, housing navigation, and ongoing case management. Street outreach plays the function of mobile access points for coordinated entry in the community as well, for people interested in housing.

When responding to encampments, non-profit outreach providers play a critical role in early engagement, assessment, and connection to services. Their involvement is especially important when jurisdictions are considering the resolution or closure of encampment sites. Outreach teams help identify individuals living in encampments, complete assessments for coordinated entry, and ensure that people are offered safe, appropriate alternatives such as shelter, safe sleeping, or permanent housing, prior to any enforcement or abatement activity.

The Role of Enforcement Bodies

Enforcement bodies, including municipal law enforcement, transit police, and code compliance officers, play a defined role in upholding local ordinances, responding to public complaints, and maintaining order in public spaces. In the context of unsheltered homelessness, these entities are often called upon when community concerns escalate around public health, safety, or environmental impact, particularly in areas with visible encampments or ongoing street or vehicular habitation.

There are several reasons why enforcement agencies may seek the movement of individuals and their belongings. These include responding to reports of unsanitary conditions, fire hazards, obstructed public rights-of-way, or illegal activity; addressing repeated complaints from residents or businesses; enforcing time, place, and manner restrictions on public space use; or carrying out municipal ordinances related to loitering, trespassing, or unauthorized camping. In some cases, enforcement actions are prompted by legal liability concerns, such as ADA compliance for blocked sidewalks or biohazard risks requiring mitigation.

The process of enforcing such ordinances often involves a range of activities, from issuing citations or providing verbal warnings to initiating encampment closures or property removal procedures. These actions may be undertaken independently or in coordination with other municipal departments, such as sanitation or public works, particularly when addressing large encampments or areas designated for public use.

If enforcement is to occur on public land, it is preferable that there is an advanced posted notice and that alternatives to where the people can go instead is known in advance. Transparency regarding enforcement gives people options that are not available if enforcement happens without advance warning. Furthermore, when street outreach is aware that an enforcement activity is slated to occur those outreach professionals can explore safe alternatives with the person prior to being dislocated.

Recognizing the complexity of these situations, this policy underscores the importance of clearly defined enforcement protocols that balance the responsibility to uphold community safety and local laws with considerations for public health, legal rights, and continuity of care for people experiencing homelessness. Ensuring appropriate training for enforcement personnel and maintaining communication between jurisdictions is also vital in supporting consistent, proportional, and lawful responses across the region.

Clarification of Policy Responsibility:

Given that the CoC (CoC) is not involved in enforcement activities, policies regarding timelines, handling, and storage of personal belongings should rest with the applicable municipal or county enforcement agencies—not the CoC. These requirements typically fall under the purview of the enforcement body responsible for operational procedures, whereas the CoC’s role is focused on funding, coordination, and support functions.

The Role of the Regional Task Force on Homelessness (RTFH) in Street Outreach and Encampment Response

As a CoC lead, RTFH is responsible for allocating federal and state funding to street outreach providers in the region through a competitive process. RTFH also establishes cross-jurisdictional policies and standards for street outreach in the region. RTFH does not respond directly to unsheltered homelessness in any manner directly and does not respond directly to encampments.

While not a direct service provider, RTFH intersects with direct operations in three important ways. The first is managing the data associated with street outreach through the Homeless Management Information System, where outputs, efforts and outcomes of street outreach are tracked. The second is in managing the Coordinated Entry System that helps match people in need of housing with available housing and support resources through a formal assessment process. The third important way RTFH

intersects with street outreach is as a convening body for training, policy development and some operational meetings, especially in areas of the county that do not have their own operational meeting structure.

Conclusion

Unsheltered homelessness in San Diego County remains one of the most visible, complex, and urgent challenges facing the region. This policy represents a collective commitment to advancing a coordinated, consistent, and compassionate approach; one that prioritizes housing, promotes safety, and affirms the dignity and worth of every individual. The strategies outlined here recognize that no single sector, jurisdiction, or organization can solve unsheltered homelessness in isolation. Solutions require sustained investment, aligned practices, and accountability across all levels of government and service provision.

We must move forward with clear roles, shared standards, and the resolve to make homelessness rare, brief, and non-recurring. This policy is not the end point. It is a framework for collective action, continuous improvement, and regional alignment. As the landscape evolves, we will measure progress, adapt to new evidence and realities, and center the voices of people with lived experience.

With commitment, coordination, and compassion, San Diego has the capacity to significantly reduce unsheltered homelessness and build a system that works for all interested and affected parties.