

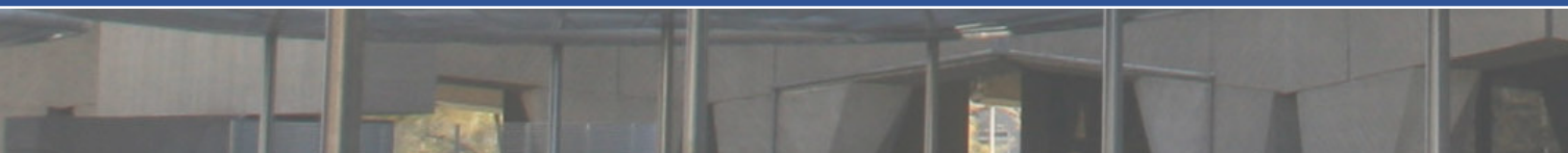


# SCORING POINTS

How Ending the Criminalization of Homelessness  
Can Increase HUD Funding to Your Community

July 2018

NATIONAL LAW CENTER  
ON HOMELESSNESS & POVERTY



## THE NATIONAL LAW CENTER ON HOMELESSNESS & POVERTY

The National Law Center on Homelessness & Poverty is the only national legal group dedicated to ending and preventing homelessness. We work to expand access to affordable housing, meet the immediate and long-term needs of those who are homeless or at risk, and strengthen the social safety-net through policy advocacy, public education, impact litigation, and advocacy training and support.

We believe all human beings have the right to a basic standard of living that includes safe, affordable housing, healthcare, and freedom from discrimination and cruelty.

For more information about the Law Center and to access publications such as this report, please visit its website at [www.nlchp.org](http://www.nlchp.org).

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## EXECUTIVE SUMMARY

As homelessness continues to grow across the country, communities are increasingly turning to ordinances that criminalize basic life-sustaining behaviors like eating, sleeping, and sheltering oneself in public, despite the lack of alternatives. **Instead of helping people escape life on the streets, criminalization of homelessness creates a costly revolving door that circulates individuals experiencing homelessness from the street to the criminal justice system and back, wasting resources that could otherwise go to reducing the number of people experiencing homelessness.**

In response to recent increases in criminalization, the Department of Housing and Urban Development (HUD) has created incentives for communities to stop criminalizing homelessness. HUD's annual Continuum of Care (CoC) Program Competition, administered by the agency's Office of Special Needs Assistance Programs (SNAPS), awards more than \$2 billion in federal funds and is the single largest source of federal funding for local communities to respond to homelessness. Local Continuums of Care (composed of state and local governments and, often, also nonprofit providers) apply for the funds through a grant competition overseen by SNAPS, which awards points to competing CoCs based on their responses to a series of questions.

In 2015, following years of advocacy by the Law Center and its partners, HUD added Question 1-C6 to its annual Continuum of Care (CoC) Program Notice Of Funding Application (NOFA). Question 1-C6 asks about CoCs' efforts to end and prevent the criminalization of homelessness in their geographic areas. It is scored on a two-point scale and can significantly affect the amount that grantees are awarded. This potential change in funding incentivizes CoCs to take active steps to ensure that persons experiencing homelessness are not deemed criminals because of their use of public space for survival, which saps resources from the collective effort to end homelessness and puts barriers in the ways of individuals trying to exit homelessness.

In order to assess the impact of Question 1-C6 on local policy and practice, the Law Center sought CoCs' responses for the three years the question has been used (2015-2017). Due to challenges in obtaining data from HUD, we conducted a manual search and were ultimately able to collect responses for 242 (61 percent) of the 398 CoCs across the country for all three years. To get more qualitative data, we conducted interviews of several CoCs that had answers that seemed especially promising. However, we emphasize that our analysis is based purely on these self-reported responses. We did not attempt to independently verify the steps taken or results reported.

**Definition: Criminalization of homelessness** is when law enforcement threatens or punishes homeless people for conducting basic, life-sustaining activities in public. Ordinances ban activities such as sleeping, resting, sheltering oneself (camping or car camping), asking for donations (panhandling), storing property in public, or simply existing in public places (loitering/loafing/vagrancy/trespass). Criminalization can also include arbitrarily or unfairly enforcing other laws, such as jaywalking or disorderly conduct against homeless individuals, and the practice of "sweeps" or displacing homeless people from outdoor public spaces through harassment, threats, and evictions from encampments.

We found that asking this question over the past three years has led to an increase in the number of cities reporting the various actions they have taken against criminalization.

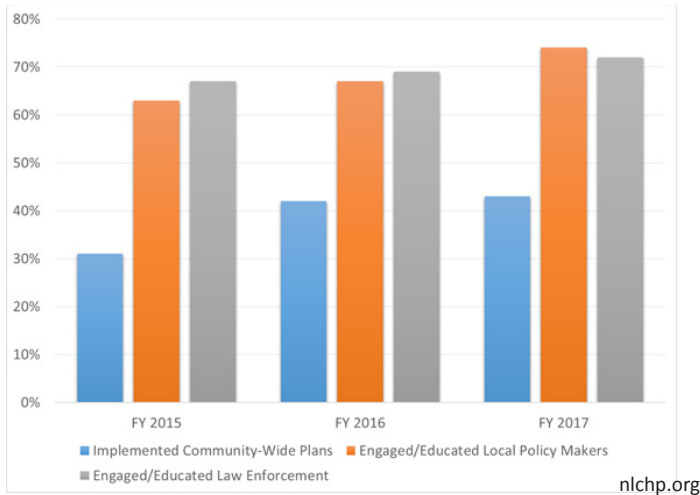
### *Key findings include:*

- CoCs reporting engagement and education of local policy makers increased by 10.3 percent and of law enforcement by 4.9 percent.
- CoCs reporting implementation of community plans increased by 11.9 percent.
- The number of CoCs reporting no strategies to prevent the criminalization of homelessness reduced significantly, from nine to only one.
- Twelve CoCs reported only one strategy implemented in 2015 but reported they were engaged in multiple strategies by 2017.
- From 2015 to 2016, we observed a substantial increase of about 12 percent in CoC applicants who provided additional details regarding their efforts in the optional "other" section. However, this percentage of CoCs fell by roughly 4 percent in 2017 (likely due to the severe reduction of character limitations on the application form from 2000 characters in 2015, 1000 in 2016, and only 50 in 2017).

**New York City lost 2 points on its NOFA one year and ended up with \$14 million less in funding. These points matter.**

**-Rob Robinson, New York City Coalition for the Continuum of Care**





*Reported strategies to prevent criminalization include:*

- Creation of advisory councils or task forces with law enforcement representatives that are dedicated to understanding criminalization and advocating against it;
- Facilitation of crisis intervention trainings for law enforcement;
- Implementation of homeless outreach teams;
- Establishment of local Homeless Persons Bill of Rights;
- Implementation/creation of service provider ride-alongs with police officers to actively engage those they come across in the proper resources;
- Creation of crisis intervention centers; and
- Establishment of court-diversion programs that offer alternative sentencing options to people with non-violent offenses and support their continued placement in housing and employment (we note these programs do not decrease criminalization, but they can lessen its impacts).

*Toolkit*

This toolkit is designed for CoCs looking to take additional steps to combat the criminalization of homelessness in order to maximize their effectiveness in ending homelessness. Resources included are:

- Overall trend data from CoCs' responses to this question and practices they implemented from 2015-2017;
- Responses that highlight potentially strong practices for decriminalizing homelessness;
- Three short interviews with CoCs that have taken steps to prevent criminalization;
- An educational one-pager on criminalization of homelessness that can be used with all the audiences listed in Question 1-C6 as part of an engagement strategy: policy makers, law enforcement agencies, businesses, and broader communities;
- An educational one-pager on principles and best practices to use when addressing homeless encampments;
- Department of Justice Community Oriented Policing Services articles discussing the role of law enforcement in combating the criminalization of homelessness which may be used to further engage law enforcement;
- Links to further federal and non-governmental resources on criminalization of homelessness; and
- CoC responses to Question 1-C6 over the past three years that we were able to collect, available on our website at [nlchp.org](http://nlchp.org).

We encourage CoCs to reach out to the Law Center and local advocates for further assistance in developing anti-criminalization strategies. We also ask CoCs maximize narrative explanations of these programs in their applications in order to share best practices and encourage replication. We also recommend HUD return the narrative section to its previous 2000 character limit to enable better sharing of strategies.

Last, but not least, we offer the tools of our national Housing Not Handcuffs Campaign, including model policies, talking points, and fact sheets, to help CoCs lend their voices and experience to the national effort against criminalization. Learn more at [housingnothandcuffs.org](http://housingnothandcuffs.org).

## INTRODUCTION

### Homeless is increasing— so are counterproductive laws criminalizing homelessness.

The growth of homelessness, especially visible homelessness, often creates a push for “quick-fix” criminalization policies that can push the problem out of public view, rather than actually address the underlying causes of homelessness. The Law Center documented a 1,342 percent growth in the number of homeless encampments reported in the media between 2007 and 2017.<sup>1</sup> This increase was accompanied by a corresponding growth of 69 percent in ordinances banning camping, 31 percent in bans on sleeping in public, 52 percent in bans on sitting and lying in public, 88 percent in bans on loitering, loafing, and vagrancy, 43 percent in bans on panhandling, and 143 percent in bans on living in vehicles between 2006 and 2016.<sup>2</sup>



Criminalization of homelessness, however, not only fails to solve homelessness, but actually makes it worse. The enforcement of criminalizing ordinances creates a costly revolving door that circulates individuals experiencing homelessness from the street to the criminal justice system and back, puts arrest records, fines, and fees in the way of their getting jobs or housing, and wastes resources that could otherwise be spent on housing and other services. Studies place the cost of chronic homelessness to the public between \$30,000 and \$50,000 per homeless person every year. This high cost is due in part to its criminalization.<sup>3</sup> A 2014 analysis by Creative Housing Solutions evaluated the cost of homelessness in Central Florida and found that providing chronically homeless people with permanent housing and case managers would cost approximately \$10,000 per person, per year; \$21,000 less than the region was spending on law enforcement

and medical costs for each chronically homeless person.<sup>4</sup> The savings from providing housing would save taxpayers \$149 million over the next decade.<sup>5</sup> Leaving out medical costs, a 2016 University of Denver study conservatively estimated Denver spent \$750,000 enforcing five anti-homeless ordinances, and six Colorado cities spent a total of at least \$5 million over a five-year period enforcing fourteen ordinances.<sup>6</sup>

If all of money spent on using law enforcement to address homelessness could be redirected to housing and service providers, communities could take major strides toward both ending homelessness and eliminating the perceived need for criminalization. Because redirecting money is the most effective solution to homelessness, the federal government has begun to take numerous policy steps to discourage the criminalization of homelessness, including the Department of Justice (DOJ) filing a brief in *Bell v. Boise* stating the DOJ’s position that the criminalization of homelessness is unconstitutional, the DOJ Community-Oriented Policing Services newsletter producing an issue focused on steps law enforcement can take against the criminalization of homelessness, and reports, guidance and blogs from the U.S. Interagency Council on Homelessness addressing criminalization as a violation of homeless Americans’ civil and human rights (all linked in our resources section). It is in this context that HUD also used the power of its purse to encourage communities to consider alternatives to criminalization.

### Question 1C-6: Since 2015, HUD has asked about criminalization of homelessness in the competitive grant application for homeless housing and service providers.

HUD’s Continuum of Care (CoC) Program Competition is an annual grant competition for more than \$2 billion in federal funds, made to nonprofit providers and state and local governments who work collaboratively to coordinate and operate housing and services to combat homelessness. The CoC designates a Collaborative Applicant to submit the application materials and apply for funding on behalf of the entire CoC. Beginning in 2015, Collaborative Applicants were required to respond to the check-box Question 1C-6: “Criminalization: Select the specific strategies implemented by the CoC to prevent the criminalization of homelessness in the CoCs geographic area. Select all that apply.” Applicants are prompted to select from the following strategies: “engaged/educated local policy makers,” “engaged/educated law enforcement,” “implemented community-wide plans,” or “no strategies have been implemented.” The 2017 application adds “engaged/educated local business leaders” to this list of check-box options. Additionally, each year’s application offers an opportunity for applicants to provide additional information in a section titled “Other.”

1 NAT’L LAW CTR. ON HOMELESSNESS & POVERTY, TENT CITY U.S.A: THE GROWTH OF AMERICA’S HOMELESS ENCAMPMENTS AND HOW COMMUNITIES ARE RESPONDING (2017), [https://www.nlchp.org/Tent\\_City\\_USA\\_2017](https://www.nlchp.org/Tent_City_USA_2017).  
 2 NAT’L LAW CTR. ON HOMELESSNESS & POVERTY, HOUSING NOT HANDCUFFS: ENDING THE CRIMINALIZATION OF HOMELESSNESS IN U.S. CITIES (2016), <https://www.nlchp.org/documents/Housing-Not-Handcuffs>.  
 3 U.S. INTERAGENCY COUNCIL ON HOMELESSNESS, ENDING CHRONIC HOMELESSNESS IN 2017 (2017), [https://www.usich.gov/resources/uploads/asset\\_library/Ending\\_Chronic\\_Homelessness\\_in\\_2017.pdf](https://www.usich.gov/resources/uploads/asset_library/Ending_Chronic_Homelessness_in_2017.pdf). Molly Moorhead, HUD secretary says a homeless person costs taxpayers \$40,000 a year, Politifact (Mar. 12, 2012), <http://www.politifact.com/truth-o-meter/statements/2012/mar/12/shaun-donovan/hud-secretary-says-homeless-person-costs-taxpayers/>.

4 Gregory A. Shinn, The Cost of Long-Term Homelessness In Central Florida: The Current Crisis & The Cost of Providing Sustainable Housing Solutions, (2014), <http://shnny.org/uploads/Florida-Homelessness-Report-2014.pdf>.  
 5 Id.  
 6 NANTIYA RUAN, TOO HIGH A PRICE: WHAT CRIMINALIZING HOMELESSNESS COSTS COLORADO (April 27, 2018), <https://ssrn.com/abstract=3169929>.



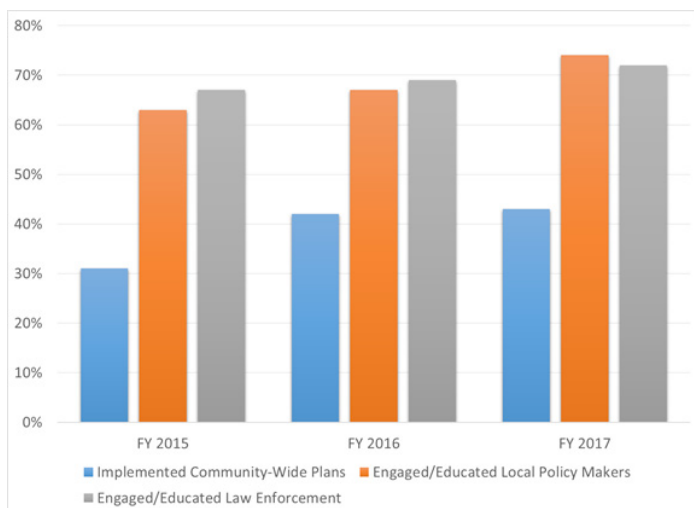
Since Question 1C-6 was added, the character limit for this section has decreased from a 2000-character limit in 2015 to a 1000-character limit in 2016 to a maximum of 50 characters in 2017.

HUD should return the character limit to the 2015 2,000-character maximum. The limit reduction from 1,000 characters in 2016 to 50 in 2017 is correlated with a 4 percent decrease in the percentage of CoCs providing additional information, and several applicants noted the challenges the character limits presented in our interviews. Having only 50 characters makes it difficult for CoCs to thoroughly detail their efforts and creates barriers to both duplicating and utilizing effective efforts in other parts of the country. Additionally, a more open-ended question highlights HUD's emphasis on creative strategies to promote decriminalization, which would reward CoCs for taking greater action to maintain funding for their efforts.

## DATA SUMMARY

### Methodology

The Law Center originally sought comprehensive data sets from HUD through a Freedom of Information Act request. However, due to extensive delays and refusal to grant a fee waiver, which we are currently litigating, we decided to proceed by collecting data manually. We looked at the websites of each point of contact listed on HUD's CoC contact list and retrieved all available applications posted for each of the 398 CoCs. For any CoCs from which we were unable to obtain all three years of data online, we followed up with emails and phone calls to the listed point of contact requesting their responses for use in this evaluation. Using this approach, the Law Center was able to obtain full (2015-2017) responses to Question 1-C6 for 242 (61 percent) of the 398 CoCs across the country and partial responses (at least one year) from the remainder of the CoCs. We then analyzed overall data and trends from these responses and identified answers reflecting elements we believe to be constructive in preventing criminalization from several CoCs to highlight in more detail. We also selected three CoCs whose responses indicated promising practices with whom we conducted phone interviews to obtain additional qualitative data. The Law Center emphasizes that the evaluation here is based purely on CoCs' self-reported responses, and it did not attempt to independently verify whether CoCs actually took the steps or achieved the results they reported in their responses. Additional work is needed to address this critical question.



### Analysis

Table 1 displays, by year, the percentages of the 242 CoC applicants for which we were able to obtain three years of data that reported implementing the strategies listed.<sup>7</sup>

Table 1.

Application Yr. >	FY 2015	FY 2016	FY 2017
Strategy Selected ✓			
Engaged/Educated Local Policy Makers	63%	67%	74%
Engaged/Educated Law Enforcement	67%	69%	72%
Engaged/Educated Local Business Leaders	N/A	N/A	64%
Implemented Community-Wide Plans	31%	42%	43%
No Strategies Implemented	3.7% (9 CoCs)	1.7% (4 CoCs)	.4% (1 CoC)
Other	31.4%	43.4%	39%

Notable trends in this data include:

- The number of CoCs reporting that they engaged or educated both local policy makers and law enforcement rose consistently – by 11 percent and 5 percent respectively over the three years.
- The number of CoCs reporting they are implementing more community-wide plans rose by 12 percent over the three years.
- From 2015 to 2017, CoCs that reported that they did not implement any strategy to prevent the criminalization of homelessness fell from 3.7 percent to 0.4 percent. Approximately 5 percent of CoCs only reported implementing one strategy in 2015, but by 2017 reported multiple strategies being implemented.
- From 2015 to 2016, the percentage of CoC applicants that went beyond the check-box responses and provided more details about their efforts in the “other” response section rose significantly despite a character-limit change from a 2,000 to 1,000 maximum. However, in 2017, when the character limit was dramatically reduced to only 50 characters, the percentage of CoCs describing these strategies fell by roughly 4 percent.

<sup>7</sup> This table only describes trends for 242 CoCs for which we were able to obtain all three years of applications, but partial data is available for all 398 CoCs. Please see Appendix, Table 2, for data trends including those additional CoCs.

## NOTABLE RESPONSES

In the open response section, we identified responses that proposed thorough, concrete actions that hold the potential for good outcomes. These responses all identified important steps that have led or could lead to policy or practice changes that reduce the criminalization of persons experiencing homelessness. We reemphasize that these responses are promising on paper, but we have not verified that they are being implemented on the local level, nor can we confirm that the proposed activities are accomplishing the ultimate goal of moving policymakers and law enforcement to reduce criminalization of homelessness. Nonetheless, we highlight elements of the stronger answers below:

### Elements of a Model Response

- Thorough descriptions of engagement and/or education of policy makers, law enforcement, business leaders, and the general public with specific methods and clearly stated outcomes (policy change, enforcement of new practice, non-enforcement of current practice, new program or collaboration executed, etc.);
- In-depth detailing of community-wide plans implemented, noting collaborators, goals, and outcomes;
- Background/context on local criminalization policies and practices and their impact on homeless individuals;
- CoC's goals and/or next steps; and
- Quantified outreach efforts and/or results on targeted population.

### Promising Themes of Model Responses

We identified eight recurring promising themes in responses.

1. **Use of public advocacy**, testimony, and/or media to oppose proposed criminalization ordinances or practices;
2. **Creation of, or participation on, advisory councils** or task forces with law enforcement, infrastructure management, and/or business representatives dedicated to understanding criminalization and advocating against it;
3. **Facilitation of law enforcement trainings** on crisis intervention or homeless sensitization;
4. **Deployment of homeless outreach teams** by law enforcement agencies;
5. **Coordination of service provision with law enforcement** or service provider ride-alongs with officers to engage homeless individuals with services rather than entry into the criminal justice system;
6. Establishment and implementation of **Homeless Persons Bills of Rights**;
7. **Opening of crisis stabilization centers** as an alternative place for first responders and others to bring people in crisis; and
8. **Establishment of court-diversion programs** that offer alternative sentencing options to people with non-violent offenses that support their continued placement in housing and employment.<sup>8</sup>

Again, more data is needed to ensure that these promising approaches are actually leading to real change. A chart highlighting the responses that reflect this theme follows:

<sup>8</sup> Not all court diversion programs are constructive. Some provide incentive to retain criminalization ordinances as “incentives” to get people into the system, and some burden homeless persons with exploitative fees to pay for the programs into which they are diverted. Diversion programs must be developed with the input of homeless persons and advocates to ensure they benefit the individuals involved.

Themes	Responses reflecting this theme (in whole or part)
Public testimony, advocacy or use of media opposing proposed criminalization ordinances or practices	<u>FY 2015</u> : Los Angeles City and County Collaborative (CA-600); Colorado Balance of State CoC (CO-500); Colorado Springs/El Paso County CoC (CO-504); Peoria, Pekin/Fulton, Tazewell, Peoria, Woodford Counties CoC (IL-507); Overland Park, Shawnee/Johnson County CoC (KS-505); Syracuse, Auburn/Onondaga, Oswego, Cayuga Counties CoC (NY-505); Portland, Gresham/Multnomah County CoC (OR-501); Dallas City & County, Irving CoC (TX-600); Seattle/King County CoC (WA-500); Vancouver/Clark County CoC (WA-508); <u>FY 2016</u> : Birmingham/Jefferson, Saint Clair, Shelby Counties CoC (AL-500); Montgomery City and County CoC (AL-504); Arizona Balance of State CoC (AZ-500); Mendocino County Collaborative (CA-509); Roseville, Rocklin/Placer, Nevada Counties (CA-515); San Diego City and County Collaborative (CA-601); Oxnard, San Buenaventura/Ventura County CoC (CA-611); Napa City and County Collaborative (CA-517); Yuba City and County/Sutter County Collaborative (CA-524); San Bernadino City and County CoC (CA-609); Colorado Balance of State CoC (CO-500); Punta Gorda/Charlotte County CoC (FL-602); Monroe County CoC (FL-604); Joliet, Bolingbrook/Will County CoC (IL-506); East Saint Louis, Belleville/Saint Clair County CoC (IL-508); South Bend, Mishawaka/Saint Joseph County CoC (IN-500); Louisville-Jefferson County CoC (KY-501); Overland Park, Shawnee/Johnson County CoC (KS-505); Charles, Calvert, Saint Mary's Counties CoC (MD-508); Portage, Kalamazoo City and County CoC (MI-507); Utica, Rome/Oneida, Madison Counties CoC (NY-518); Tulsa City and County (OK-501); Hillsboro, Beaverton/Washington County CoC (OR-506); Waco/McLennan County CoC (TX-604); Texas Balance of State CoC (TX-607); Wisconsin Balance of State CoC (WI-500); West Virginia Balance of State CoC (WV-508); <u>FY 2017</u> : Montgomery City and County CoC (AL-504); Little Rock/Central Arkansas CoC (AR-500); Fresno City and County/Madera County Collaborative (CA-514); Redding/Shasta, Siskiyou, Lassen, Plumas, Del Norte, Modoc, Sierra Counties Collaborative (CA-516); Napa City and County Collaborative (CA-517); San Bernadino City and County CoC (CA-609); Colorado Balance of State CoC (CO-500); Metropolitan Devner CoC (CO-503); Madison County CoC (IL-504); Joliet, Bolingbrook/Will County CoC (IL-506); Lexington – Fayette County CoC (KY-502); Lowell CoC (MA-508); Prince George's County CoC (MD-600); Battle Creek/Calhoun County CoC (MI-514); Eaton County CoC (MI-523); Albuquerque (NM-500); Las Vegas/Clark County CoC (NV-500); Cleveland/Cuyahoga County CoC (OH-502); Hillsboro, Beaverton/Washington County CoC (OR-506); Fort Worth, Arlington/Tarrant County CoC (TX-601); Utah Balance of State CoC (UT-503); Richmond/Henrico, Chesterfield, Hanover Counties CoC (VA-500); Washington Balance of State CoC (WA-501); Wisconsin Balance of State CoC (WI-500); West Virginia Balance of State CoC (WV-508);
Creation of, or participation on, advisory councils or task forces, with law enforcement, infrastructure management, and/or business representatives, dedicated to understanding criminalization and advocating against it	<u>FY 2015</u> : Sacramento City and County Collaborative (CA-503); Santa Rosa, Petaluma/Sonoma County Collaborative (CA-504); Los Angeles City and County Collaborative (CA-600); Long Beach CoC (CA -606); Colorado Balance of State CoC (CO-500); Columbus-Muscogee/Russell County CoC (GA-505); Punta Gorda/Charlotte County CoC (FL-602); Missouri Balance of State CoC (MO-606); Syracuse, Auburn/Onondaga, Oswego, Cayuga Counties CoC (NY-505); Buffalo, Niagara Falls/Erie, Niagara, Orleans, Genesee, Wyoming Counties CoC (NY-508); Nassau, Suffolk Counties CoC (NY-603); Columbus/Franklin County CoC (OH-503); Eugene, Springfield/Lane County CoC (OR-500); Philadelphia CoC (PA-500); Columbia/Midlands CoC (SC-502); Dallas City & County, Irving CoC (TX-600); Seattle/King County CoC (WA-500); Spokane City and County CoC (WA-502); <u>FY 2016</u> : Oakland, Berkley, Alameda County Collaborative (CA-502); Sacramento City and County Collaborative (CA-503); Visalia/Kinds Tulare Counties (CA-513); Napa City and County Collaborative (CA-517); Santa Ana/Anaheim, Orange County Collaborative (CA-602); Santa Maria/Santa Barbara County Collaborative (CA-603); Riverside City and County Collaborative (CA-608); Metropolitan Devner CoC (CO-503); Ocala/Marion County CoC (FL-514); Ft. Lauderdale/Broward County CoC (FL-601); Columbus-Muscogee/Russell County CoC (GA-505); Marietta/Cobb County CoC (GA-506); Sioux City/Dakota Woodbury Counties CoC (IA-500); McHenry County CoC (IL-500); Peoria, Pekin/Fulton, Tazewell, Peoria, Woodford Counties CoC (IL-507); Chicago CoC (IL-510); Southern Illinois CoC (IL-520); Wichita/Sedwick County CoC (KS-502); Louisville-Jefferson County CoC (KY-501); New Orleans/Jefferson Parish CoC (LA-503); Murrae/Northeast Louisiana CoC (LA-505); Cape Cod Islands CoC (MA-503); Springfield/Hampden County CoC (MA-504); Portland (ME-502); Eaton County CoC (MI-523); Winston-Salem/Forsyth County CoC (NC-500); Asheville/Buncombe County CoC (NC-501); Omaha, Council Bluffs CoC (NE-501); Trenton/Mercer County CoC (NJ-514); Albuquerque (NM-500); New Mexico Balance of State (NM-501); Syracuse/Aubur/Onondaga, Oswego, Cayuga Counties CoC (NY-505); Ithaca/Tompkins County CoC (NY-510); Clackamas County CoC (OR-507); Philadelphia CoC (PA-500); Beaver County CoC (PA-603); Austin/Travis County CoC (TX-503); Washington Balance of State CoC (WA-501); Wisconsin Balance of State CoC (WI-500); Milwaukee City and County CoC (WI-501); Racine City and County CoC (WI-502); <u>FY 2017</u> : Sacramento City and County Collaborative (CA-503); Riverside City and County Collaborative (CA-608);

Themes	Responses reflecting this theme (in whole or part)
Facilitation of crisis intervention or homeless sensitization trainings for law enforcement	<u>FY 2015</u> : Bakersfield/Kern County CoC (CA-604); Poughkeepsie/Dutchess County CoC, (NY-601); Yonkers, Mount Vernon/Westchester County CoC (NY-606) FY 2015; Columbus-Muscogee/Russell County CoC (GA-505); Columbia/Midlands CoC (SC-502); Madison County CoC (IL-504); Columbus/Franklin County CoC (OH-503); South Dakota Statewide CoC (SD-500); Milwaukee City and County CoC (WI-501 ); <u>FY 2016</u> : Turlock, Modesto/Stanislaus County Collaborative (CA-510); Los Angeles City and County Collaborative (CA-600); Bakersfield/Kern County CoC (CA-604); Bridgeport, Stamford, Norwalk/Fairfield County (CT-503); Ocala/Marion County CoC (FL-514); Ft. Lauderdale/Broward County CoC (FL-601); Augusta-Richmond County CoC (GA-504); Columbus-Muscogee/Russell County CoC (GA-505); Marietta/Cobb County CoC (GA-506); Lexington – Fayette County CoC (KY-502); Worcester City & County CoC (MA-506); Baltimore County (MD-501); Annapolis Anne Arundel County CoC (MD-503); Winston-Salem/Forsyth County CoC (NC-500); Asheville/Buncombe County CoC (NC-501); Ithaca/Tompkins County CoC (NY-510); Poughkeepsie/Dutchess County CoC (NY-601); Nassau, Suffolk Counties CoC (NY-603); Yonkers, Mount Vernon/Westchester County CoC (NY-604); Pittsburgh, McKeesport, Penn Hills/Allegheny County CoC (PA-600); Columbia/Midlands CoC (SC-505); South Dakota Statewide CoC (SD-500); San Antonio/Bexar County CoC (TX-500); Seattle/King County CoC (WA-500); Racine City and County CoC (WI-502); <u>FY 2017</u> : Turlock, Modesto/Stanislaus County Collaborative (CA-510); Santa Ana/Anaheim, Orange County Collaborative (CA-602); Santa Maria/Santa Barbara County Collaborative (CA-603); Long Beach CoC (CA-606); Fort Walton Beach/Okaloosa, Walton Counties CoC (FL-505); Panama City/Bay, Jackson Counties CoC (FL-515); Monroe County CoC (FL-604); Bloomington/Central Illinois CoC (IL-512); New Bedford CoC (MA-505); Worcester City & County CoC (MA-506); Howard County CoC (MD-504); Carroll County CoC (MD-506); Saint Joseph/Andre, Buchanan, DeKalb Counties (MO-603); Durham City and County CoC (NC-502); Cattaraugus County CoC (NY-504); Columbus/Franklin County CoC (OH-503); Portland, Gresham/Multnomah County CoC (OR-501); Jackson/West Tennessee CoC (TN-507); San Antonio/Bexar County CoC (TX-500); Wisconsin Balance of State CoC (WI-500);
Deployment of homeless outreach teams by law enforcement agencies	<u>FY 2015</u> : Marin County Collaborative (CA-507); Daly City/San Mateo County Collaborative (CA-512); Fresno City and County/Madera County Collaborative (CA-514); Humboldt County Collaborative (CA-522); Bakersfield/Kern County CoC (CA-604); Long Beach CoC (CA-606); Frederick City and County CoC (MD-509); Winston-Salem/Forsyth County CoC (NC-500); Austin /Travis County CoC (TX-503); Milwaukee City and County CoC (WI-501); <u>FY 2016</u> : San Jose, Santa Clara City and County Collaborative (CA-500); Marin County Collaborative (CA-507); Fresno City and County/Madera County Collaborative (CA-514); Humboldt County Collaborative (CA-522); Glendale CoC (CA-612); Worcester City & County CoC (MA-506); Frederick City and County CoC (MD-509); Knoxville/Knox County CoC (TN-502); Austin/Travis County CoC (TX-503); Everett/Snohomish County CoC (WA-504); <u>FY 2017</u> : Marin County Collaborative (CA-507); Yuba City and County/Sutter County Collaborative (CA-524); Los Angeles City and County Collaborative (CA-600); Frederick City and County CoC (MD-509); Ithaca/Tompkins County CoC (NY-510); Austin /Travis County CoC (TX-503); Waco/McLennan County CoC (TX-604); Tacoma, Lakewood/Pierce County CoC (WA-503); Everett/Snohomish County CoC (WA-504);



Themes	Responses reflecting this theme (in whole or part)
Service provider ride-alongs or coordination with law enforcement officers to engage homeless individuals with services rather than entry into the criminal justice system	<u>FY 2015</u> : Santa Rosa, Petaluma/Sonoma County Collaborative (CA-504); Fresno City and County/Madera County Collaborative (CA-514); Syracuse, Auburn/Onondaga, Oswego, Cayuga Counties CoC (NY-505); Buffalo, Niagara Falls/Erie, Niagara, Orleans, Genesee, Wyoming Counties CoC (NY-508); Ithaca/Tompkins County CoC (NY-510); Yonkers, Mount Vernon/Westchester County CoC (NY-604); <u>FY 2016</u> : Oakland, Berkley, Alameda County Collaborative (CA-502); Turlock, Modesto/Stanslaus County Collaborative (CA-510); San Diego City and County Collaboration (CA-601); Imperial County CoC (CA-613); San Luis Obispo County CoC (CA-614); Wichita/Sedwick County CoC (KS-502); Champaign, Urbana, Rantoul/Champaign County CoC (IL-502); IL-503 - Champaign, Urbana, Rantoul/Champaign County CoC (IL-503); New Orleans/Jefferson Parish CoC (LA-503); Worcester City & County CoC (MA-506); Frederick City and County CoC (MD-509); Saint Clair Shores, Warren/Macomb County CoC (MI-503); Saint Joseph/Andre, Buchanan, DeKalb Counties (MO-603); Kansas City, Independence, Lee's Summit/Jackson County CoC (MO-604); Durham City and County CoC (NC-502); Greensboro, Highpoint CoC (NC-504); Trenton/Mercer County CoC (NJ-514); Syracuse, Auburn/Onondaga, Oswego, Cayuga Counties CoC (NY-505); Buffalo, Niagara Falls/Erie, Niagara, Orleans, Genesee, Wyoming Counties CoC (NY-508); Ithaca/Tompkins County CoC (NY-510); Yonkers, Mount Vernon/Westchester County CoC (NY-604); Cincinnati/Hamilton County CoC (OH-500); Eugene, Springfield/Lane County CoC (OR-500); Portland, Gresham/Multnomah County CoC (OR-501); Pittsburgh, McKeesport, Penn Hills/Allegheny County CoC (PA-600); Columbia/Midlands CoC (SC-502); South Dakota Statewide CoC (SD-500); Milwaukee City and County CoC (WI-501); <u>FY 2017</u> : Arizona Balance of State CoC (AZ-500); Daly City/San Mateo County Collaborative (CA-512); Panama City/Bay, Jackson Counties CoC (FL-515); Columbus-Muscogee/Russell County CoC (GA-505); Trenton/Mercer County CoC (NJ-514); Springfield/Hampden County CoC (MA-504); Charlotte/Mecklenburg County CoC (NC-505); Syracuse, Auburn/Onondaga, Oswego, Cayuga Counties CoC (NY-505); Yonkers, Mount Vernon/Westchester County CoC (NY-604); Philadelphia CoC (PA-500); Portland, Gresham/Multnomah County CoC (OR-501); Medford, Ashland/Jackson County CoC (OR-502); Oregon Balance of State CoC (OR-505); Clackamas County CoC (OR-507); Columbia/Midlands CoC (SC-502); Seattle/King County CoC (WA-500);
Establishment and implementation of Homeless Persons Bills of Rights	<u>FY 2015</u> : Rhode Island CoC (RI-500); Joliet, Bolingbrook/Will County CoC (IL-506); <u>FY 2016</u> : Daytona Beach, Daytona/Volusia, Flagler Counties CoC (FL-504); Joliet, Bolingbrook/Will County CoC (IL-506); Rhode Island CoC (RI-500); <u>FY 2017</u> : Maine Balance of State (ME-500); Portland (ME-501);
Opening of crisis stabilization centers as an alternative place for first responders and others to bring people in crisis	<u>FY 2015</u> : Baton Rouge CoC (LA-504); Baltimore CoC (MD-501); <u>FY 2016</u> : Poughkeepsie/Dutchess County CoC (NY-601); Utah Balance of State CoC (UT-503); <u>FY 2017</u> : Baltimore County (MD-501); Saint Joseph/Andre, Buchanan, DeKalb Counties (MO-603); Kansas City, Independence, Lee's Summit/Jackson County CoC (MO-604);



Themes	Responses reflecting this theme (in whole or part)
Establishment of court-diversion programs that offer alternative sentencing options to people with non-violent offenses that support their continued placement in housing and employment (we note these must be developed with the needs of homeless persons in mind so that they do not actually increase criminalization while attempting to lessen its impacts)	FY 2015: Arizona Balance of State CoC (AZ-500); Sacramento City and County Collaborative (CA-503); Richmond/Contra Costa County Collaborative (CA-505); Fresno City and County/Madera County Collaborative (CA-514); Davis, Woodland/Yolo County Collaborative (CA-521); Buffalo, Niagara Falls/Erie, Niagara, Orleans, Genesee, Wyoming Counties CoC (NY-508); Baltimore CoC (MD-501); Boston Coc (MA-500); Durham City and County CoC (NC-502); SC-500 - Charleston/Low Country CoC (SC-500); Columbia/Midlands CoC (SC-502); Davis, Woodland/Yolo County Collaborative (CA-521); Austin /Travis County CoC (TX-503); Spokane City and County CoC (WA-502); FY 2016: San Jose, Santa Clara City and County Collaborative (CA-500); Watsonville/Santa Cruz City and County Collaborative (CA-508); Tucson/Pima County CoC (AZ-501); Atlanta CoC (GA-500); Asheville/Buncombe County CoC (NC-501); Knoxville/Knox County CoC (TN-502); Central Tennessee CoC (TN-503); Houston/Harris County CoC (TX-700); Spokane City and County CoC (WA-502); Prince William County CoC (VA-604); FY 2017: Watsonville/Santa Cruz City and County Collaborative (CA-508); Stockton/San Joaquin County Collaborative (CA-511); Davis, Woodland/Yolo County Collaborative (CA-521); Sarasota, Bradenton/Manatee, Sarasota Counties CoC (FL-500); New Orleans/Jefferson Parish CoC (LA-503); Boston Coc (MA-500); Springfield/Greene, Christian, Webster Counties CoC (MO-600); Eugene, Springfield/Lane County CoC (OR-500); Knoxville/Knox County CoC (TN-502); Murfreesboro/Rutherford County CoC (TN-510); Everett/Snohomish County CoC (WA-504);

### Examples of Notable Responses

The tables below highlight exemplary responses that use the model elements and themes discussed above. We group these responses by year, quoting the CoC directly, because of the varying character limit for each year discussed above (2000-character limit in 2015, 1000 in 2016, 50 in 2017).

CoC Name	2015 Strategies for Decriminalization (2000-character limit)	Model Elements Demonstrated	Themes Demonstrated
<b>NY-505 - Syracuse, Auburn/Onondaga, Oswego, Cayuga Counties CoC</b>	Syracuse Police attend both the CoC General Meeting and the Outreach Committee meeting. Police will always contact the CoC to determine ways to get individuals housed and suggestions for how to best serve unsheltered individuals. // The Downtown Committee of Syracuse employs a retired police officer that also attends the Outreach Committee meetings and canvasses the area with outreach staff. Individuals who are panhandling are not ticketed and phone calls are made to outreach providers instead. The CoC has active communication with law enforcement. // Panhandling bans are discussed from time to time but never implemented due to CoC advocacy efforts.	<ul style="list-style-type: none"> <li>Thorough description of engagement with policy makers, law enforcement, and business leaders</li> <li>Quantified results</li> </ul>	<ul style="list-style-type: none"> <li>Public advocacy against proposed criminalization ordinances</li> <li>Participation on advisory councils with law enforcement</li> <li>Coordination with law enforcement officers</li> </ul>
<b>CO-504 Colorado Springs/El Paso County CoC</b>	Moratorium on enforcement of solicitation ordinances; the city has declared a moratorium on enforcement of solicitation ordinances in response to community input and pending reviews. Hold on sit/lie ordinance: A sit/lie ordinance was originally proposed in response to a vagrancy issue in part of downtown. It was then dramatically reduced in scope based on feedback from the community, and has been postponed while alternatives are explored. City and CoC are engaging landlords in an effort to reduce barriers and accept more clients by demonstrating the value of case-managed tenants.	<ul style="list-style-type: none"> <li>Clearly stated outcomes of engagement of business leaders (landlords) and policy makers</li> <li>Background on status of local ordinances</li> <li>Continuum's next steps and strategies stated; notes collaborators</li> </ul>	<ul style="list-style-type: none"> <li>Public advocacy against proposed criminalization ordinances</li> </ul>

CoC Name	2015 Strategies for Decriminalization (2000-character limit)	Model Elements Demonstrated	Themes Demonstrated
CA-600 Los Angeles City and County Collaborative	On June 23, 2015, City of Los Angeles Ordinance No 183762 repealed and replaced Section 56.11, Article 6, Chapter V or the Los Angeles Municipal Code to prohibit the storage of personal property in public areas. Due to the education and engagement by LAHSA, homeless housing and service providers, homeless/formerly homeless individuals, and other stakeholders, the City Council placed the ordinance on hold and did not implement pending amendment. LAHSA and other CoC members worked with the City of LA to amend language and omit the penalties associated with this ordinance, as well as looking to ensure that a study be done regarding gaps in storage and public lavatories throughout the City. As a result of these efforts, on Nov 17, 2015, the LA City Council amended the ordinance to remove sanctions and criminal penalties, reducing sanction further than the initial municipal code. LAHSA has also met with the LA County Board of Supervisors, the regional convening of LA County Mayors, and numerous legislative, municipal legal staff and criminal justice policy makers to educate them on the need to prevent criminalization and remove legal staff and criminal justice policy makers to educate them on the need to prevent Emergency Response Teams outreach efforts with the Healthy Street Project in collaboration with the LA city, Dept. of Sanitation, Bureau of Public Works and LAPD to ensure homeless people are properly noticed of street cleaning schedules and to conduct outreach to homeless individuals/families in encampments. These efforts seek to ensure connection to services and housing, and to prevent escalation of encounters with other public services that can lead to arrest. LAHSA is also leading the LA County Homeless Outreach Assessment Project to assess all current outreach teams, services, and geographic reach to document all gaps and make recommendations better coordination for the LA CoC.	<ul style="list-style-type: none"> <li>Detailed background on local ordinance and its impact on population</li> <li>Thorough descriptions of education/engagement of local policymakers, collaborators and direct decriminalization results</li> <li>Continuum's goals and next steps explicitly stated with mention of collaborators</li> <li>Descriptions of specific strategy and convening executed</li> </ul>	<ul style="list-style-type: none"> <li>Public advocacy against proposed criminalization ordinances</li> <li>Creation of advisory councils with law enforcement and infrastructure management</li> <li>Deployment of homeless outreach teams by law enforcement</li> </ul>
IL-507 - Peoria, Pekin/Fulton, Tazewell, Woodford Counties CoC	Nuisance Ordinances: Since the last NOFA consolidated application 2 cites in our service area have implemented nuisance ordinances. The ordinances hold landlords responsible to lock out tenants when a defined threshold of police involvement has been met. At lock out, individuals often become homeless. The CoC has expressed its concern regarding the ordinances with both City officials and police departments. The CoC has sought assistance from the Shriver Center and is collaborating with local pro-bono legal services regarding the legalities of the ordinances.	<ul style="list-style-type: none"> <li>Background on local criminalization ordinance and names with direct impact on target population</li> <li>Description of engagement of policy makers, law enforcement</li> <li>Notes other collaborators, including legal advocates</li> </ul>	<ul style="list-style-type: none"> <li>Public advocacy against proposed criminalization ordinances</li> </ul>

CoC Name	2015 Strategies for Decriminalization (2000-character limit)	Model Elements Demonstrated	Themes Demonstrated
TX-600 - Dallas City & County, Irving CoC	<p>Dallas has experienced a notable increase in tent city under the I-45 overpass with populations ranging from 75-125. The City intended to take action to evict the campers. MDHA conducted a community dialogue on the existence of encampments in July 2015 reviewing the National Law Center on Homelessness and Poverty No Safe Place report and brought in tent city expert Chris Herring to meet with city and state transportation officials to counter the intended action of eviction without a structured housing plan. MDHA created a street outreach team to begin weekly visits to engage campers, assess needs, and coordinate housing providers. The City agreed to give the effort at least six months. The demonstration has provided detailed information for the need to increase street outreach in Dallas from a police department critical intervention team and one PATH team. The City is including the need for expanded multidisciplinary street outreach in its upcoming state funded Healthy Community Collaborative grant RFP in December 2015. The City agreed to provide dumpsters and Port-o-lets to improve the sanitation and health concerns and gain trust of the campers. MDHA contracted social security benefits application and critical document assistance, and has prepared 52 Documentation of Priority Status assessments to create the CoC's first centralized housing priority list from the camper population. These efforts demonstrate to the city alternatives to criminalization and eviction. In tandem with these efforts, MDHA is working with neighborhood and business associations, volunteers from a marketing firm and Hewlett Packard creative team to develop a public education campaign for alternatives to panhandling giving. The campaign also will encourage giving to the MDHA Flexible Assistance Fund and provide funds for day-labor micro-work for persons experiencing homelessness. This effort is to reduce ticketing of homeless panhandlers and the issuance of criminal trespass warrants.</p>	<ul style="list-style-type: none"> <li>• Thorough descriptions of engagement and/or education of policy makers, law enforcement, business leaders with specific methods, and clearly stated outcomes</li> <li>• Background/ context on local criminalization policies and practices and impact on homeless individuals</li> <li>• Continuum's goals and/or next step</li> <li>• Quantified outreach efforts and/or results on targeted population</li> </ul>	<ul style="list-style-type: none"> <li>• Public advocacy against proposed criminalization ordinances</li> <li>• Creation of advisory councils with law enforcement and business representatives</li> </ul>

CoC Name	2016 Strategies for Decriminalization (1000-character limit)	Model Elements Demonstrated	Themes Demonstrated
CA-522 Humboldt County Collaborative	<p>Implemented Homeless Advocate: the local PD has a Homeless Advocate on staff, and members of Law Enf. were also some of the 250+ attendees at the Housing First Summit. The Summit provided a chance to discuss alternate strategies that do not lead to further criminalization of individ. and families exp. homelessness. having a homeless advo. on PD staff enables LE to gain a perspective perhaps otherwise difficult to achieve. By also participating in the Summit, members of PS also had the opp. to come together w many interested members of the community, encourag. further participation and accountability. //</p> <p>PD Mental Health Training: DHHS works w mult. LEAs to plan &amp; provide mental health trainign to officers annually. Chief of Eureka PD has been a champion of this work. A Mental Health Clinician and Case Manager travel w 2 officers to work w most vulnerable persons experiencing homelessness. 2 BoS members and one City Councilmember have also been on outreach trips. As the CoC has inc. efforts to involve LE in de-criminalizing homelessness, the result has been a 24 percent dec. in arrests. //</p> <p>Homeless Strategy &amp; Implementation Plan: This yr cmtty implemented Phase 1 of a Strategic Plan to prevent &amp; end hln, informed by input from cmtty stakeholders inc. Police Chief. It states that rental assistance is needed for those exiting the criminal justice system, &amp; that arrests are not the long-term solution. Members of Exec Cmte discussed the Plan &amp; are working w cmtty leaders, BoS members, Eureka City Council members, Eureka PD, city planners &amp; business owners in Community Homeless Improvement Project (CHIP) to work against the criminalization of homelessness. CHIP develops solutions for Eureka's homeless, resulting in funds for short-term housing while perm. housing is secured. Funds for deposits and rent, substance us trtmt, &amp; for op. of the MIST outreach program were secured through county funds to support this effort.</p>	<ul style="list-style-type: none"> <li>• Clear description of engagement and education of law enforcement and outcomes</li> <li>• Clear description of engagement of local policy makers, and quantified outcome of collaboration</li> <li>• In-depth detailing of community-wide plan, including specific objectives, listing of participants, and progress update</li> </ul>	<ul style="list-style-type: none"> <li>• Public advocacy against proposed criminalization ordinances</li> <li>• Deployment of homeless outreach team</li> <li>• Creation of advisory council with law enforcement participation</li> <li>• Facilitation of training for law enforcement</li> </ul>

CoC Name	2016 Strategies for Decriminalization (1000-character limit)	Model Elements Demonstrated	Themes Demonstrated
CO-504 Colorado Springs/El Paso County CoC	<p>Moratorium on enforcement of solicitation ordinances: the city has declared a moratorium on enforcement of solicitation ordinances in response to community input and pending reviews. No camping bans are not enforced if there are no housing options for people, except in instances of safety (flooding) or on private property where owner requests enforcement. Homeless Outreach Team updates CoC members/providers on current status or changes.</p> <p>A sit/lie ordinance was originally proposed in response to a vagrancy issue in part of downtown. It was then dramatically reduced in scope based on feedback from the community. Was passed but now is limited to blocking of passage on a public right-of-way.</p> <p>City and CoC providers are engaging landlords in an effort to reduce barriers and accept more clients by demonstrating the value of case-managed tenants. Governor's Office on Homeless Initiatives is seeking funding for a Landlord Engagement fund and technical assistance to assist communities was an "Open Doors Atlanta" type of process.</p>	<ul style="list-style-type: none"> <li>• Background on status of relevant ordinances (updated from 2015)</li> <li>• Describes outcomes of community engagement</li> <li>• Clearly stated outcomes of engagement of business leaders (landlords) and policy makers</li> <li>• Details potential next steps and current engagement of policy makers to take action</li> </ul>	<ul style="list-style-type: none"> <li>• Public advocacy against proposed criminalization ordinances</li> <li>• Deployment of homeless outreach teams</li> <li>• Coordination with law enforcement</li> </ul>
NY-510 Ithaca/Tompkins County CoC	<p>The county hired a Community Outreach Worker to provide assistance to individuals and business owners in the area known as the Ithaca Commons. This pilot was a success in its first year, with findings showing the outreach worker assisted 52 unique individuals with homelessness or insufficient housing as their presenting issue. There were 336 encounters with these individuals, with police being called in less than 2 percent of those encounters, and referrals being made in 46 percent of those encounters. The CoC also participates in meetings with business owners on the West End of the city, where the emergency shelter sits. Residents of the shelter can sometimes be seen loitering in front of businesses, and the CoC engages with the shelter providers and business owners in an effort to maintain the safety of customers, shop owners and clients- to make everyone feel safe and welcomed and halt the need for police intervention. // The City of Ithaca is in the process of implementing a Law Enforcement Assisted Diversion (LEAD) plan which will allow officers to divert offenders from jail and into services. The LEAD program will partner with local social service agencies, and homeless service providers, to ensure that those who are homeless and suffering are not criminalized.</p>	<ul style="list-style-type: none"> <li>• Description of pilot strategy implemented</li> <li>• Quantified results of strategy on target population</li> <li>• Thorough description of engagement with business leaders and other partners</li> <li>• Description of next steps, collaborators and objectives</li> </ul>	<ul style="list-style-type: none"> <li>• Coordination with law enforcement</li> <li>• Participation in advisory councils with business</li> </ul>

CoC Name	2017 Strategies for Decriminalization (50-character limit)	Model Elements Demonstrated	Themes Demonstrated
OR-501 Portland, Gresham/ Multnomah County CoC	Community policing with trauma informed practices; 24 hr. notice b4 sweeps, coordinated with outreach teams; “Safety Off the Streets” Committee develops policy.	<ul style="list-style-type: none"> <li>Brief description of reduced criminalization practices/ outcomes</li> <li>Statement of engagement of law enforcement and policy makers</li> </ul>	<ul style="list-style-type: none"> <li>Coordination with law enforcement</li> <li>Public advocacy against proposed criminalization ordinances</li> </ul>
WI-501 Milwaukee City and County CoC	Milwaukee County resolution; County Outreach Collaborative, Advocacy Sub-Group; WI Department of Transportation draft policy	<ul style="list-style-type: none"> <li>Notes positive outcome</li> <li>Showcases existence of county-wide collaboration</li> <li>Displays next steps that will engage policy makers and state agencies</li> </ul>	<ul style="list-style-type: none"> <li>Public advocacy against proposed criminalization ordinances</li> <li>Participation in advisory councils</li> </ul>
MN-502 Rochester/ Southeast Minnesota CoC	Criminal record expungement assistance; Joining landlord associations	<ul style="list-style-type: none"> <li>Statement of collaboration with and engagement of business leaders, law enforcement and policy makers</li> <li>Demonstrates strategy implemented that directly decriminalizes homelessness</li> </ul>	<ul style="list-style-type: none"> <li>Participation in advisory councils</li> </ul>
OR-505 Oregon Balance of State CoC	Mayors on Agency Board of Directors; Law Enforcement on homeless coalitions; Myriad community plans within 28 counties	<ul style="list-style-type: none"> <li>Engagement of policy makers and law enforcement</li> <li>Quantified community-plan efforts</li> </ul>	<ul style="list-style-type: none"> <li>Participation in advisory councils</li> </ul>
ME-500/ME-502	Work w/ volunteer lawyers’ projects & judiciary; HomelessVoicesForJustice train PoliceAcademyCadets; ME developing a Homeless Bill of Rights	<ul style="list-style-type: none"> <li>Engagement of policy makers</li> <li>Describes collaboration to educate law enforcement</li> <li>Defines state-wide next steps</li> </ul>	<ul style="list-style-type: none"> <li>Facilitation of trainings</li> <li>Establishment of Homeless Persons Bill of Rights</li> </ul>



## INTERVIEWS

The following Continuums of Care (identified by their geographic location and CoC number) demonstrated several of the model elements, displaying potentially significant efforts to decriminalize homelessness. Through interviews with Collaborative Applicants, or representatives, of these CoCs, the Law Center gathered more detailed narratives of their strategies, challenges, and successes. We emphasize again that we have not independently verified these narratives.

### Knoxville/Knox County CoC (TN-502) – Encampment Protocol

**2016 NOFA Response:** “For encampments that must be removed, the Knoxville Police Department and Public Service Departments have implemented a policy that includes advanced notification of at least 72 hours, outreach coordination with social service providers. This protocol was designed specifically to recognize human dignity, and with the intent of helping people access resources, housing and to end their homelessness. // The local courts, District Attorney, Public Defender, and Legal Aid Society have established a quarterly legal assistance session for indigent homeless individuals who are requesting relief from legal issues such as court costs and fines that have been identified as barriers to housing or employment. Participants must be working with a case manager to end their homelessness. With a case plan and agreement from a judge, these barriers can be lifted, enabling the individual to access housing, services and employment.”

**Background:** In Knoxville, Tennessee, encampment sweeps severely set individuals back in terms of their ability to acquire permanent housing and essential services. Collaborative Applicant Michael Dunthorn from the City of Knoxville Office on Homelessness noted that there was not an encampment eviction culture in which law enforcement sought out encampments to sweep, but when sweeps were mandated by the government, the existing protocol encouraged the criminalization of individuals experiencing homelessness.

**Strategies:** Michael and his team raised the issue of criminalization to the Knoxville Police Department (KPD) and organized service providers to collaborate on a series of meetings and drafts of new policy. The KPD acknowledged the ineffectiveness of current policy and was willing to transform. A primary concern was devising a permanent policy that could endure police personnel turnover. Through collaboration with local service providers, KPD put the advanced notification and social service provider coordination policy in place. The CoC and KPD state that their priority is housing and social services. They have demonstrated this commitment to decriminalization through other collaborative strategies to reduce criminalization such as a quarterly legal assistance session.

**Challenges:** Michael mentioned the challenge of fitting more details regarding their next steps into the FY 2017 application response, which capped their response at 50-characters. An

additional challenge is that people experiencing homelessness may perceive a strong relationship between social service providers and law enforcement, which might keep some of them from accepting or reaching out to providers.

**Next Steps:** In March 2018, Knoxville opened a behavioral health diversion center which allows individuals experiencing homelessness with mental illness or drug addiction to receive treatment rather than be taken to jail.

### San Antonio/ Bexar County CoC (TX-500) – ID Recovery

**2016 NOFA Response:** “The state of Texas does have some laws that make it a crime if individuals fail to show ID at the request of a peace officer. This made it illegal for an adult to not have an ID in our jurisdiction. The San Antonio Police Department’s homeless outreach team developed a way to reduce the ID recovery time from three months to less than 24 hours by capitalizing on the State Department Public Safety’s fingerprinting system. Now SAPD takes ID recovery referrals from service providers to make sure that the homeless have rapid access to an ID.”

**Background:** Based on concerns about the effect of these harsh practices surrounding identification documents on homeless people raised by the CoC, in 2014-2015, the local San Antonio newspaper ran a series of stories on these practices and increased pressure on stakeholders to take action. See, e.g. Alexa Garcia-Ditta and Elaine Wolff, SAPD Issues Thousands of Tickets for Homelessness, San Antonio Current (Oct. 21, 2014), <https://www.sacurrent.com/sanantonio/sapd-issues-thousands-of-tickets-for-homelessness/Content?oid=2326560>. The San Antonio Police Department (SAPD) and the Sheriff’s Department acknowledged that criminalization was not effective and began strategizing better methods of addressing the homelessness crisis.

**Strategies:** With the collaboration of the CoC, the SAPD adopted a program already employed in Houston by setting up a homeless outreach team and developing an ID recovery system that utilizes pre-existing fingerprints. Rather than arresting or ticketing homeless individuals found without ID, officers now take them to police headquarters where they use a fingerprint system to check for pre-existing fingerprints files from a former ID, hospitalization, or arrest. A staffer submits an affidavit on the applicant’s behalf and a picture is taken of the individual holding their affidavit. The individual then shows the picture to the Department of Public Safety (DPS) in order to obtain an ID. The CoC notes that this process is self-resolving: people are recovering necessary identification and as a result, many are capable of pursuing their own employment and housing. The CoC also notes that the new practice has positively changed SAPD’s interactions with persons experiencing homeless and has led to other constructive practices. The SAPD assisted with the Point-In-Time Count by assigning a community policing officer

to help volunteers find locations where unsheltered homeless individuals reside. Additionally, the CoC has engaged city officials to improve processes of transporting individuals to crisis facilities and has encouraged investment in more positive interventions.

**Challenges:** The biggest hurdle was obtaining a Memorandum of Understanding (MOU) between DPS and SAPD that would permit the usage of the picture of the homeless individual and their affidavit for ID recovery. Some challenges that remain include the lack of funding for SAPD to operate the ID recovery service. ID's cost \$12-\$22, and if an individual's fingerprint is not in the system, they must take the longer, traditional recovery route which creates more barriers to permanent housing. Further, access to the Homeless Management Information System (HMIS) is limited to a select group of officers involved in the outreach team, which limits the number of people who can process the requests. Additionally, the CoC notes that police still enforce some criminalizing ordinances targeting homeless individuals in their area.

**Next Steps:** The CoC will continue to fundraise to ensure that individuals do not have to pay out of pocket for their ID recovery. It also hopes to replicate a new initiative in an Austin CoC that hopes to establish a reliable electronic data warehouse for ID recovery and to create a certified database that could be used for state-wide ID recovery. It hopes to demonstrate through effective programs that alternatives to criminalization are the more effective approach to ending homelessness.

#### Los Angeles City and County Collaborative (CA-600) – Public Advocacy Against Criminalization and For Housing

**2016 NOFA Response:** “On June 23, 2015, City of Los Angeles Ordinance No 183762 repealed and replaced Section 56.11, Article 6, Chapter V or the Los Angeles Municipal Code to prohibit the storage of personal property in public areas. Due to the education and engagement by LAHSA [Los Angeles Homeless Service Authority], homeless housing and service providers, homeless/formerly homeless individuals, and other stakeholders, the City Council placed the ordinance on hold and did not implement pending amendment. LAHSA and other CoC members worked with the City of LA to amend language and omit the penalties associated with this ordinance, as well as looking to ensure that a study be done regarding gaps in storage and public lavatories throughout the City. As a result of these efforts, on Nov 17, 2015, the LA City Council amended the ordinance to remove sanctions and criminal penalties, reducing sanction further than the initial municipal code. LAHSA has also met with the LA county Board of Supervisors, the regional convening of LA County Mayors, and numerous legislative, municipal legal staff and criminal justice policy makers to educate them on the need to prevent criminalization and remove legal staff and criminal justice policy makers to educate them on the need to prevent Emergency Response Teams outreach efforts with the Healthy Street Project in collaboration with the LA city, Dept. of Sanitation, Bureau of Public Works and LAPD to ensure homeless people are properly noticed of street cleaning schedules and to conduct outreach to

homeless individuals/families in encampments. These efforts seek to ensure connection to services and housing, and to prevent escalation of encounters with other public services that can lead to arrest. LAHSA is also leading the LA County Homeless Outreach Assessment Project to assess all current outreach teams, services, and geographic reach to document all gaps and make recommendations better coordination for the LA CoC.”

**Background:** Homelessness in LA County has radically increased by 75 percent over six years—up to 58,000 individuals are homeless and three-fourths of that population are unsheltered. In 2014-2015, the County Supervisor and the mayor started planning joint meetings and drafting 10-year plans on ending homelessness. The City Council's Homelessness and Poverty Committee, chaired by a former community organizer, was made into a standing committee in 2015, and now convenes Collaborative Applicants on a bi-monthly basis for an exchange of ideas and effective strategies. The City passed a \$1.2 billion bond initiative in 2017 that would create 10,000 permanent housing and some storage facility units in the next ten years. However, the initiative would still need more capital to be fully implemented

**Strategies:** The CoC and the County Board of Supervisors successfully advocated with the community to pass ballot Measure H, a quarter-cent sales tax expected to raise \$255 million a year for the next 10 years across the county with goals of producing capital for shelter and supportive housing. Through consistent outreach and education, the CoC engaged key stakeholders, including local policy makers, to effect important decriminalization policy. Additionally, the CoC coordinated required trauma-informed care training for the LAPD and engaged the sheriff's department for training smaller enforcement agencies throughout the county. The CoC also piloted the Homeless Outreach and Proactive Engagement program in the San Fernando Valley to pair CoC social outreach workers and police officers to ensure individuals are connected to services. The CoC hopes to expand the program in the coming years.

**Challenges:** In 2016, despite the efforts of the CoC, the city council updated the storage ordinance permitting personal storage only up to 60 gallons, where anything above this limit can be seized and placed in involuntary storage. Although the CoC mention that the addition of Question 1C-6 allowed it to highlight its efforts, it notes that the declining word limitation provided a challenge for adequately detailing strategies. Additionally, it notes that local elected officials must weigh a number of considerations that sometimes overpower the idea that the CoC's specific efforts to reduce the criminalization of homelessness is a determining factor in CoC funding. For example, amendments to the public storage ordinance cannot be enforced effectively if there is not enough storage space.

**Next Steps:** The CoC is actively seeking out other effective models for solutions to storage capacity across the country to utilize in the context of the homelessness crisis. It will continue to engage local policy makers, as City Council and elected

officials are transparent about wanting to hear the voice of advocacy organizations and the community. Additionally, the CoC will continue to leverage the strong advocates who organize community members, especially of persons experiencing homelessness that reside on Skid Row.

## RESOURCES

On the following pages, CoCs will find a number of resources, including:

- An educational one-pager on criminalization of homelessness that can be used with all the audiences listed in Question 1-C6 including government officials, law enforcement, businesses, and residents as part of an outreach strategy;
- An educational one-pager on principles and best practices in addressing homeless encampments;
- Department of Justice Community Oriented Policing Services Dispatch articles discussing the role of law enforcement in combating the criminalization of homelessness; and
- Links to additional resources.

# HOUSING NOT HANDCUFFS

## FACT SHEET: The Top Five Ways Criminalization of Homelessness Harms Communities

### WHAT IS CRIMINALIZATION OF HOMELESSNESS?

**Criminalization of homelessness** is when law enforcement threatens or punishes homeless people for doing things in public that every person has to do. This can include activities such as sleeping, resting, sheltering oneself, asking for donations, or simply existing in public places. It also includes arbitrarily or unfairly enforcing other laws, such as jaywalking or disorderly conduct against homeless individuals, and the practice of “sweeps” or displacing homeless people from outdoor public spaces through harassment, threats, and evictions from living in camps.

#### 1. Criminalization does not address the real causes of homelessness.

We’re all better off when we live in communities that work together to solve problems. No one wants to see people forced to live on the streets—not businesses, not residents, and most of all, not those on the streets themselves. But the high cost of housing prevents too many people from being able to get into affordable housing, and lack of health care has turned our streets and prisons into our default housing for those with mental health issues. *These are systemic problems, not the fault of the families, youth, veterans, and other individuals on our streets, and require all of us working together to address it.*

#### 2. Criminalization worsens homelessness.

Because people experiencing homelessness are not on the street by choice but *because they lack choices*, criminal and civil punishment serves no constructive purpose. Criminalization policies make the problem of homelessness worse. When homeless people are saddled with crippling high fines and fees for minor traffic tickets or incarcerated for having to live outdoors, it hurts their employment and housing options, access to education, family stability, and communities. This isn’t an effective way to keep our communities safe, and it’s disruptive to families and communities.

#### 3. Criminalization is expensive and wasteful.

Instead of helping people escape life on the streets, criminalization creates a costly revolving door that circulates individuals experiencing homelessness from the street to the criminal justice system and back, wasting resources that could otherwise go to solving the problem. Federal studies show that *chronic homelessness, due in part to its criminalization, costs the public between \$30,000 and \$50,000 per person every year*. Communities that criminalize may face expensive lawsuits and lose out on federal funds. The federal government awards extra points to communities that decrease criminalization in its \$2.5 billion competitive federal grant program for homeless services.

#### 4. Criminalization is unconstitutional.

A growing number of courts have struck down laws punishing sleeping and camping in public and to the practice of homeless sweeps, under the 4<sup>th</sup>, 8<sup>th</sup>, and 14<sup>th</sup> Amendments.

Panhandling bans have also been struck down in federal courts across the country on 1<sup>st</sup> Amendment free speech grounds. Indeed, since the 2015 U.S. Supreme Court case *Reed vs. Gilbert*, 100 percent of legal challenges to panhandling bans (including so-called “aggressive panhandling bans”) have been successful.

#### 5. Housing, services, and protecting renters works better and more cost-effectively.

We know what works when it comes to reducing homelessness: housing. Housing stability makes it possible for a person to get or keep a job, address health problems, or get an education. That’s why “Housing First” programs, which provide not just shelter, but housing and then services like health care, have seen the greatest success in permanently ending homelessness.

In city after city, where laws and policies are changed to reduce the city’s reliance on law enforcement and instead invest in affordable, supportive housing, it gets homeless people off the streets far more effectively and far more cheaply than endlessly cycling people through courts, jails, and back onto the streets.

“It should be uncontroversial that punishing conduct that is a universal and unavoidable consequence of being human violates the Eighth Amendment... Sleeping is a life-sustaining activity—i.e., it must occur at some time in some place. If a person literally has nowhere else to go, then enforcement of [an] anti-camping ordinance against that person criminalizes her for being homeless.”

-U.S. Dept. of Justice, *Bell v. Boise* (2015)

A study by the Economic Roundtable of Homelessness in Los Angeles, which included approximately 10,000 homeless people, found that housing reduced average monthly spending by 41 percent per person, even after including the cost of providing housing. *This savings included a 95 percent reduction in jail facilities and services costs.*

Ending criminalization is critical, but communities must also ensure access to affordable housing *and* prevent homelessness by stabilizing rental housing. This can be accomplished by:

- Strengthen renters’ rights by eliminating evictions without good cause, and providing a right to counsel in eviction cases.
- Reducing housing discrimination by making it unlawful to deny housing based upon an individual’s criminal, eviction, or credit history that is unrelated to the individual’s future ability to abide by reasonable terms of tenancy.

For a full list of constructive approaches, see our model policy legislation at: <http://housingnohandcuffs.org/policy-solutions/>.

## JOIN HOUSING NOT HANDCUFFS

***If you want to see an end to homelessness in your community, endorse our campaign at [HousingNotHandcuffs.org](http://HousingNotHandcuffs.org), learn more about the best practices that are working around the country, and call for an end to criminalization and more support for housing so we can all enjoy a community where no one has to sleep on the streets or beg for their daily needs.***



## Encampment Principles & Best Practices

Based on input from federal, state, and local representatives, service providers, and people experiencing homelessness, as well as relevant domestic and international laws, our initial findings revealed certain key principles and corresponding practices that appear to be important for successful interventions to end encampments in our communities. These principles and practices are excerpted from TENT CITY, USA: The Growth of America's Homeless Encampments and How Communities are Responding ([https://www.nlchp.org/Tent\\_City\\_USA\\_2017](https://www.nlchp.org/Tent_City_USA_2017)), which also includes numerous case studies of communities implementing these best practices. As a caution, we note that while incorporating interim encampments into a plan to end homelessness may provide homeless individuals with an improvement in their quality of life and reduce calls for criminalization, the community must also have a serious and funded long-term plan that ensures the availability of permanent, adequate, appropriate housing for all, so encampments do not become a permanent feature of our cities and towns.

Encampment Principles and Practices	
<p><b>Principle 1:</b> 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.</p>	<ol style="list-style-type: none"> <li>1. Determine the community's full need for housing and services, and then create a binding plan to ensure full access to supportive services and housing affordable for all community members so encampments are not a permanent feature of the community.</li> <li>2. Repeal or stop enforcing counterproductive municipal ordinances and state laws that criminalize sleeping, camping, and storage of belongings.</li> <li>3. Provide safe, accessible, and legal places to sleep and shelter, both day and night. Provide clear guidance on how to access these locations.</li> <li>4. Create storage facilities for persons experiencing homelessness, ensuring they are accessible—close to other services and transportation, do not require ID, and open beyond business hours.</li> </ol>
<p><b>Principle 2:</b> Delivery of services must respect the experience, human dignity, and human rights of those receiving them.</p>	<ol style="list-style-type: none"> <li>1. Be guided by frequent and meaningful consultation with the people living in encampments. Homeless people are the experts of their own condition.</li> <li>2. Respect autonomy and self-governance for encampment residents.</li> <li>3. Offer services in a way that is sensitive and appropriate with regard to race, ethnicity, culture, disability, gender identity, sexual orientation, and other characteristics. Use a trauma-informed approach.</li> </ol>
<p><b>Principle 3:</b> Any move or removal of an encampment must follow clear procedures that protect residents.</p>	<p>Create clear procedures for ending homelessness for people living in pre-existing encampments, including:</p> <ol style="list-style-type: none"> <li>1. Make a commitment that encampments will not be removed unless all residents are first consulted and provided access to adequate alternative housing or—in emergency situations—another adequate place to stay.</li> <li>2. If there are pilot periods or required rotations of sanctioned encampments, ensure that residents have a clear legal place to go and assistance with the transition. Pilot periods or requiring rotation of legal encampments/parking areas on a periodic basis (e.g., annually or semi-annually) can help reduce local “not-in-my-back-yard” opposition, but shorter time periods hinder success.</li> <li>3. Provide sufficient notice to residents and healthcare/social service workers to be able to determine housing needs and meet them (recommended minimum 30 days, but longer if needed).</li> <li>4. Assist with moving and storage to enable residents to retain their possessions as they transfer either to housing, shelter, or alternative encampments.</li> </ol>

<p><b>Principle 4:</b> 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.</p>	<ol style="list-style-type: none"> <li>1. Establish clear end dates by which point adequate low-barrier housing or appropriate shelter will be available for all living in the legal encampments.</li> <li>2. Protect public health by providing access to water, personal hygiene (including bathrooms with hand washing capability), sanitation, and cooking services or access to SNAPs hot meals benefits.</li> <li>3. Provide easy access to convenient 24-hour transportation, particularly if services are not co-located.</li> <li>4. Statutes and ordinances facilitating partnerships with local businesses, religious organizations, or non-profits to sponsor, support or host encampments or safe overnight parking lots for persons living in their vehicles can help engage new resources and improve the success of encampments.</li> <li>5. Do not require other unsheltered people experiencing homelessness to reside in the encampments if the facilities do not meet their needs.</li> </ol>
<p><b>Principle 5:</b> Adequate alternative housing must be a decent alternative.</p>	<ol style="list-style-type: none"> <li>1. Ensure that emergency shelters are low-barrier, temporary respites for a few nights while homeless individuals are matched with appropriate permanent housing; they are not long-term alternatives to affordable housing and not appropriate in the short term for everyone. Low-barrier shelter includes the “3 P’s”—pets, possessions, and partners, as well as accessible to persons with disabilities or substance abuse problems.</li> <li>2. Adequate housing must be: <ol style="list-style-type: none"> <li>a. Safe, stable, and secure: a safe and private place to sleep and store belongings without fear of harassment or unplanned eviction;</li> <li>b. Habitable: with services (electricity, hygiene, sanitation), protection from the elements and environmental hazards, and not overcrowded;</li> <li>c. Affordable: housing costs should not force people to choose between paying rent and paying for other basic needs (food, health, etc.);</li> <li>d. Accessible: physically (appropriate for residents’ physical and mental disabilities, close to/transport to services and other opportunities) and practically (no discriminatory barriers, no compelling participation in or subjection to religion).</li> </ol> </li> </ol>
<p><b>Principle 6:</b> Law enforcement should serve and protect all members of the community.</p>	<ol style="list-style-type: none"> <li>1. Law and policies criminalizing homelessness, including those criminalizing public sleeping, camping, sheltering, storing belongings, sitting, lying, vehicle dwelling, and panhandling should be repealed or stop being enforced.</li> <li>2. Law enforcement should serve and protect encampment residents at their request.</li> <li>3. Law enforcement officers—including dispatchers, police, sheriffs, park rangers, and private business improvement district security—should receive crisis intervention training and ideally be paired with fully-trained multi-disciplinary social service teams when interacting with homeless populations.</li> </ol>

Beyond these specific recommendations, in order to create the long-term housing solutions communities needed to permanently end encampments, we also encourage individuals and organizations to look at the model policies of the Housing Not Handcuffs Campaign: [housingnohandcuffs.org](http://housingnohandcuffs.org).

# community policing Dispatch

Volume 8 | Issue 12 | December 2015



**COPS**  
Community Oriented Policing Services  
U.S. Department of Justice

The *Community Policing Dispatch* is the e-newsletter of the COPS Office.

It aims to educate readers about a variety of criminal justice issues that affect the implementation of community policing and to assist law enforcement practitioners to more effectively address crime and social disorder in their communities.

To view, download, or subscribe to the *Dispatch*, visit <http://cops.usdoj.gov/html/dispatch/index.asp>.

COMMUNITY POLICING  
BUILDING Relationships  
SOLVING Problems

## Alternatives to Criminalization: The Role of Law Enforcement

People enter a career in law enforcement for a variety of reasons. Police officers serve the community, uphold the law, and save lives. But what do officers do when the policies in their communities challenge their efforts to improve the quality of life for those they serve?

One such policy is the criminalization of homelessness, an approach that some cities and towns are taking in an attempt to get people off the street. Not only does the practice do little to prevent and end homelessness but it also takes law enforcement officers away from their important work of solving crime and protecting the public. Fortunately, law enforcement can play an important role in creating solutions to homelessness that we know are more effective than criminalization and can even save taxpayer dollars.

### Criminalization: An inefficient use of resources

People experiencing homelessness, like all people, should be held accountable when they violate the law. But arresting people for performing basic life-sustaining activities like sleeping in public takes law enforcement professionals away from what they are trained to do: fight crime. It also forces them into a role they were not trained for—interacting with people who are often coping with untreated mental health or substance abuse issues. Instead, communities need to focus resources on creating affordable housing and sufficient affordable treatment options for people dealing with serious mental health or substance abuse problems. Virtually all homelessness would disappear if there was a sufficient quantity of affordable, adequate, safe places to live.

As police departments work to implement the recommendations of the President's Task Force on 21st Century Policing (<http://www.cops.usdoj.gov/policingtaskforce>), conversations about how police can best respond to homelessness using a "guardian" rather than "warrior" approach should be front and center, and there are some solutions police can implement themselves. These programs need funding to support them and, equally importantly, funding to support the services they offer as an alternative to criminal consequences.

Examples of where police departments have taken a leadership role in this critical issue include the following:

- ◆ Police departments, in Houston, Texas (<http://www.houstoncit.org/test/>); Colorado Springs, Colorado (<https://cspd.coloradosprings.gov/public-safety/police/community-outreach/homeless-outreach>), and elsewhere have created Homeless Outreach Teams, partnering mental health, social service, and law enforcement personnel together so that people experiencing homelessness are first offered social services and outreach rather than arrested when complaints are called in.
- ◆ Police in Washington, D.C., partner with the Washington Legal Clinic for the Homeless (<http://www.legalclinic.org/>) to provide homeless response training to every new class of recruits at the police academy.

Police have the opportunity to implement better policies for interaction with people experiencing homelessness such as those above. A model set, based on those in Washington, D.C., Philadelphia, and elsewhere, is available in our Criminalization Advocacy Manual ([http://www.nlchp.org/documents/No\\_Safe\\_Place\\_Advocacy\\_Manual](http://www.nlchp.org/documents/No_Safe_Place_Advocacy_Manual)).

## Share your important insights as part of a broader conversation

As important as internal changes are, law enforcement must be involved in conversations about what the entire community must do to support effective policing and effective housing policies. This is a two-way street—we encourage law enforcement officials to voice their opinions and also encourage policy makers to solicit their input.

Some important things to share with policy makers include the following:

- ◆ Law enforcement officers bring valuable experience to the conversation that can help them partner with providers to bring safety and services to the community as part of a larger strategy to end homelessness.
- ◆ It is more expensive to keep a person experiencing homelessness who has been arrested for a nonviolent offense in pretrial detention for months (as they often can't pay bail) than to provide them with housing.
- ◆ It is neither safe nor appropriate to put law enforcement on the front lines to resolve mental health, substance abuse, and housing crises when what people experiencing homelessness really need is housing and adequate services.
- ◆ It is not cost-effective to send out a team of ten officers to sweep a homeless encampment when there is not an adequate alternative place for people to be, so the camp will necessarily spring up again elsewhere and the cycle will be repeated. (Read more about effective community-based solutions to homeless encampments.)

The bottom line is that the criminalization of homelessness does not solve the problem of homelessness. Instead, it burdens people experiencing homelessness with arrest records and forces police departments to arrest people for crimes related to not having access to housing and services.

The Federal Government is working to implement alternatives to criminalization (<https://www.usich.gov/news/leading-by-example-on-human-rights-of-people-experiencing-homelessness>) in our communities, and we at the National Law Center on Homelessness and Poverty (<http://www.nlchp.org/>) are ready to help.

*Eric Tars  
Senior Attorney, National Law Center  
on Homelessness and Poverty*

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COMMUNITY POLICING  
BUILDING Relationships  
SOLVING Problems

## Incarceration and Homelessness: Breaking the Cycle

Every year, more than 600,000 people exit the criminal justice system and return to their communities. A significant proportion of them were homeless when they were incarcerated. Many will return to homelessness when they leave jail or prison. And still others may experience homelessness for the first time.

In order to begin to address the overall challenges of re-entry, President Obama announced new actions to promote rehabilitation and reintegration for the formerly incarcerated (<https://www.whitehouse.gov/the-press-office/2015/11/02/fact-sheet-president-obama-announces-new-actions-promote-rehabilitation>). For criminal justice reform to be successful, however, we must address how we work with people experiencing homelessness. Because ending homelessness happens at the local level, we are excited to have the opportunity this issue of the *Dispatch* provides to further the dialogue with law enforcement agencies and officers—a cornerstone of the communities in which the work is taking place—and examine the role they can play in implementing alternatives to criminalization.

An estimated 25 to 50 percent of people experiencing homelessness also have a history of incarceration. This overlap poses challenges for communities' efforts to engage and assist people experiencing homelessness and to end homelessness. In addition to being costly, criminalization can impede communities' attempts to prevent and end homelessness. Arresting a person for actions associated with homelessness rather than providing them with necessary health care and other services can exacerbate health and behavioral health problems. Further, criminal records result in barriers to housing and other services upon release, making it harder for people to become stable members of our communities.

In order to prevent people from cycling between incarceration and homelessness, federal partners are taking action to help communities promote alternatives to criminalizing homelessness and involvement with the criminal justice system. Some ways the Federal Government is already tackling this issue include the following:

- ◆ The U.S. Interagency Council on Homelessness focused on these issues at its October 2015 meeting, convening leaders from agencies like the U.S. Departments of Justice (DOJ), Housing and Urban Development (HUD), Labor, Health and Human Services (HHS), and many other member agencies to discuss strategies for reducing criminal justice involvement among people experiencing homelessness.



- ◆ HUD has included a scoring incentive for communities to implement specific strategies that prevent or reduce the criminalization of homelessness within the 2015 Continuum of Care program competition (<https://www.hudexchange.info/resources/documents/FY-2015-CoC-Program-NOFA.pdf>).
- ◆ The DOJ filed a statement of interest brief (<http://www.justice.gov/opa/pr/justice-department-files-brief-address-criminalization-homelessness>) opposing a Boise, Idaho, anti-camping ordinance, arguing that making it a crime for people who are experiencing homelessness to sleep in public places when there is insufficient shelter space in a city unconstitutionally punishes them for being homeless.
- ◆ The U.S. Government responded to a United Nations inquiry on human rights, expressing its commitment to helping communities pursue alternatives to criminalizing homelessness (<https://geneva.usmission.gov/2015/09/01/addendum-of-the-united-states-of-america-to-the-report-of-the-working-group-on-its-universal-periodic-review/>) in response to the Human Rights Council's recommendation to "amend laws that criminalize homelessness."
- ◆ Federal partners are working to provide support to communities who are seeking alternatives to criminalization through tools and reports like Searching out Solutions and the recently released Ending Homelessness for People Living in Encampments: Advancing the Dialogue.

These efforts are buoyed by the work of our partners at the local and state level. Communities across the country are dedicated to ending and preventing homelessness, and law enforcement can play key roles and offer unique perspectives necessary to inform this discussion and end the cycle between homelessness and jail or prison experienced by so many. This issue of the Dispatch provides us with an important opportunity to advance the dialogue, with an article that discusses how Continuums of Care and law enforcement agencies can collaborate to reduce homelessness, information about an upcoming toolkit from DOJ for law enforcement agencies that are interested in developing or improving their outreach with homeless populations, a piece from the National Law Center on Homelessness and Poverty on the important role of law enforcement in enacting alternatives to criminalization, and firsthand experiences of officers who have successfully instituted new approaches to ending homelessness.

We hope this information will help you engage in a dialogue in your community. For more information, sign up for USICH's newsletter ([http://visitor.r20.constantcontact.com/manage/optin/ea?v=001I2TVJ\\_D-QVhkuJ9VgCCOrg%3D%3D](http://visitor.r20.constantcontact.com/manage/optin/ea?v=001I2TVJ_D-QVhkuJ9VgCCOrg%3D%3D)).

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# community policing Dispatch

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**COPS**  
Community Oriented Policing Services  
U.S. Department of Justice

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COMMUNITY POLICING  
BUILDING Relationships  
SOLVING Problems

## Law Enforcement is a Critical Component of the Coordinated Effort to End Homelessness

Kevin is a divorced 60-year-old Vietnam War veteran who no longer has contact with his family. After his wife left and he wasn't able to find work, Kevin started drinking. He has been living on the streets for the last few years. Without a clear system for accessing services, Kevin would be responsible for navigating loosely affiliated programs on his own and might knock on many doors before finding help. Even if he found an organization that would hear his request for help, the best an organization could do would be to determine if Kevin was a good fit for their project, and if not, he'd be back to square one.

Does this story sound familiar? Imagine having the chance to partner with a system that has an effective, coordinated process that identifies the individual needs and preferences of people and can connect people experiencing chronic homelessness, like Kevin, with appropriate services and supports. With a coordinated system, when Kevin asks for help, the intake worker will be able to ask "What housing and services strategy available in the community would be best for Kevin?" And the process would be seamless, easily accessible, and consistent regardless of where the person asks for help.

Luckily, this vision is now being put into action across the country. The U.S. Department of Housing and Urban Development (HUD) and its partners on the U.S. Interagency Council on Homelessness (USICH) are working with Continuums of Care to develop coordinated systems. Continuums of Care are regional and local planning bodies that coordinate housing and services for people experiencing homelessness by integrating efforts of local police departments, health care agencies, homeless service providers, and other public and private partners.

All too often, at the point at which law enforcement gets involved, it is to take action such as arresting people or forcing movement to other areas, which is costly both in terms of the financial cost to the community as well as increasing distrust and conflict. One of the main purposes of building a coordinated system is to ensure that people with the most severe service needs and levels of vulnerability are prioritized for housing and homeless assistance in a timely manner. For law enforcement officers working with some of the most vulnerable individuals in the community, this is good news.

Homeless service agencies and law enforcement agencies have the same goal in mind: to reduce the incidence of homelessness, particularly for people who are staying out on the streets. Law enforcement agencies can be a critical partner in local efforts to end homelessness. Communities that have developed these partnerships have seen reductions in the number of persons experiencing homelessness and the number of arrests for life-sustaining activities such as panhandling.

Searching out Solutions: Constructive Alternatives to Criminalization (<https://www.hudexchange.info/news/snaps-in-focus-the-case-against-laws-that-criminalize-homelessness/>), a document developed by HUD, USICH, the U.S. Department of Justice (DOJ), and state and local partners, offers three strategies. Each of these strategies builds on the effort to develop a coordinated system and is designed to seek to divert people from sleeping outside toward housing and services they needed to achieve stability.

- ◆ **Engage in cross-training.** Cross-training and sharing information among providers and law enforcement provides insight into practices and policies of partnering agencies, facilitates coordination of activities, and enhances sensitivity in working with people experiencing homelessness. Law enforcement agencies can offer expertise on public safety and protection of vulnerable individuals. Homeless service providers can share their expertise and leverage the expertise of the health care system to share how to engage with people experiencing homelessness and how to identify and respond to mental health or substance abuse crisis.

Broward County, Florida, Homelessness 101 was created as a police sensitivity project intended to reinforce the police department's policy on homelessness, raise awareness to the reality and causes of homelessness, and address the most effective intervention techniques.

- ◆ **Coordinate outreach and engagement.** Close coordination and communication between the outreach teams and law enforcement agencies is essential for assuring the safety of outreach teams and of people experiencing homelessness and quickly connecting people to housing. In some communities, law enforcement personnel participate as core members of outreach teams. In other instances, law enforcement officials call upon outreach teams for assistance when they encounter people who are experiencing homelessness and are at risk of arrest.

The Police-Homelessness Outreach Program (P-HOP) in Ramsey County, Minnesota, brings outreach workers and police officers together to respond to situations involving people experiencing homelessness. A P-HOP worker is stationed at a local police station and acts as a liaison to the homeless community.

- ◆ **Form a crisis intervention team.** Last, communities can deploy crisis intervention teams (CIT) that involve specially trained police officers working with behavioral health professionals to respond to crises involving people with mental illness, some of whom are homeless. Police officers learn to recognize the signs of psychiatric distress and how to de-escalate a crisis and seek to divert those individuals in crisis away from jail or arrest into treatment. Concurrently, through the Continuum of Care, the coordinated system is designed to quickly connect people in need with housing and services and make available other low-barrier crisis supports people may need.

The Memphis, Tennessee, Crisis Intervention Team is a specialized unit that responds to crises involving people with mental illnesses. University of Tennessee studies report that the CIT program has contributed to a decrease in arrest rates for people who are mentally ill, an impressive rate of diversion into the health care system, and a resulting low rate of mental illness in the jails.

Law enforcement agencies are encouraged to connect with their local Continuum of Care to explore the possibility of implementing one or more of the strategies discussed. Collaborating around shared goal creates a win-win situation for everyone involved. Visit the HUD Exchange website (<https://www.hudexchange.info/>) for contact information and for more information about local Continuums of Care and what HUD is doing to end homelessness.

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# community policing Dispatch

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COMMUNITY POLICING  
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## Outreach and Engagement: Collaborative Responses to Homelessness

"You can't arrest your way out of homelessness," Officer Nathan Schwiethale states with the confidence borne of success in reaching out to and engaging people experiencing homelessness. He is a member of the Wichita (Kansas) Police Department's (WPD) Homeless Outreach Team (HOT) that received commendation in early 2015 from the Kansas House of Representatives for its dedication to a new approach to ending homelessness.

This approach focuses on earning the trust of people experiencing homelessness and addressing their needs by working with appropriate service providers. This may divert people away from the court system and get them back on their feet. Through the program, "Karl" regained housing and full-time employment after 32 years of living on the street. "Jimmy," an overnight user of the Union Rescue Mission, was reunited with his sister back home in Texas. "Robert" and "Rachael," a couple spending their nights apart at the respective men's and women's shelters, launched new careers together.

## Making connections to meet needs

For these success stories, WPD HOT officers facilitated access to employment and arranged transportation for people they encountered on the street and in shelters. But the help needed can be far more complicated. All members of the WPD HOT are required to complete crisis intervention team (CIT) training for responding to situations involving behavioral health issues. Schwiethale notes, "Our HOT officers use the CIT training on the job a lot. In fact, our goal is to engage one of the HOT officers as a CIT trainer for other officers in the department. We want to have at least 25 percent of all officers trained in CIT."

The extensive use of CIT training is not surprising. According to the U.S. Department of Housing and Urban Development (HUD) data, 18.43 percent of people experiencing homelessness have a serious mental illness.<sup>1</sup> That percentage is higher in the Wichita

1 Current Statistics on the Prevalence and Statistics of People Experiencing Homelessness in the United States (Washington, DC: Substance Abuse and Mental Health Services Administration, 2011), [https://www.hudexchange.info/resource/reportmanagement/published/CoC\\_PopSub\\_NatTerrDC\\_2015.pdf](https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_NatTerrDC_2015.pdf).

area, according to COMCARE of Sedgwick County, a SAMHSA grantee provider and key partner of the WPD HOT.<sup>2</sup> Chronic substance use is also a significant issue for communities: per the HUD data, as many as 18.39 percent of persons experiencing homelessness have a chronic substance use disorder.<sup>3</sup>

Crises may also erupt in response to trauma. Having lost the stability of a home, people experiencing homelessness may feel marginalized from society, and they are vulnerable to victimization.<sup>4</sup> This can exacerbate earlier trauma brought on by childhood abuse and neglect, domestic violence, community violence, and poverty.<sup>5</sup> A study on post-traumatic stress disorder (PTSD) among people experiencing homelessness found that PTSD preceded the onset of homelessness in almost three-quarters of those studied. (Learn more about trauma training for criminal justice professionals. Go to <http://www.samhsa.gov/gains-center/trauma-training-criminal-justice-professionals>).

## **SAMHSA: The behavioral health link**

As the leader of public health efforts to advance the behavioral health of the nation, SAMHSA has prioritized the availability of permanent housing and supportive services for individuals with mental and substance use disorders. SAMHSA makes funding available through several grant programs, including Projects for Assistance in Transition from Homelessness (PATH).

PATH is a formula grant to the 50 states, the District of Columbia, and U.S. territories used to engage people with serious mental illness, including those with co-occurring substance use disorders. The program has a strong outreach and case management component; in 2013, more than 185,000 people experiencing homelessness benefited from PATH's outreach services. (Find a local PATH provider. Go to <http://pathprogram.samhsa.gov/Super/Path/Grantees.aspx>)

In its partnership with the WPD, COMCARE uses PATH dollars to facilitate case management, organize community education, and provide referrals to behavioral health treatment, housing, and employment. It also purchases backpacks, socks, food, drinks, and other supplies for the WPD HOT to distribute, which helps build trust between the officers and those experiencing homelessness.

In its first year, the WPD HOT successfully housed 132 people who previously lived on the street, changing lives while saving the city an estimated \$5.3 million in costs such as emergency medical services and unnecessary involvement with the court system. This level of savings is supported by a study from the University of North Carolina at Charlotte ([http://www.csh.org/wp-content/uploads/2015/05/Moore-Place-Evaluation-Project\\_Final-Report\\_4-28-15.pdf](http://www.csh.org/wp-content/uploads/2015/05/Moore-Place-Evaluation-Project_Final-Report_4-28-15.pdf)), which indicated that placement in permanent supportive housing resulted in an 82 percent reduction in arrests and an 89 percent reduction in nights spent in jail.

2 "COMCARE: Homelessness," Sedgwick County, Kansas, accessed November 25, 2015, [https://www.hudexchange.info/resource/reportmanagement/published/CoC\\_PopSub\\_CoC\\_KS-502-2015\\_KS\\_2015.pdf](https://www.hudexchange.info/resource/reportmanagement/published/CoC_PopSub_CoC_KS-502-2015_KS_2015.pdf).

3 Current Statistics (see note 1).

4 "Trauma," Substance Abuse and Mental Health Services Administration, accessed November 25, 2015, <http://homeless.samhsa.gov/channel/trauma-29.aspx>.

5 "Trauma-Informed Organizational Toolkit for Homeless Services," Substance Abuse and Mental Health Services Administration, accessed November 25, 2015, <http://homeless.samhsa.gov/Resource/Trauma-Informed-Organizational-Toolkit-for-homeless-services-49573.aspx>.



## Specialized police responses

The HOT model is considered one of several specialized police responses (SPR) gaining favor across the country. Among SPRs, CIT is perhaps the most widely recognized. Much like CITs, HOTs consist of highly trained officers, but with specific dedication to issues arising in the population experiencing homelessness. Partnering with homeless service providers, the business community, and other stakeholders, HOT officers connect people experiencing homelessness to housing assistance and mainstream services like health care, job training and placement, and legal assistance. Instead of arresting, ticketing, or jailing people experiencing homelessness, HOT officers act as the connection to aid and assistance.

In addition to the cost savings mentioned earlier, SPRs increase officer safety, enhance job satisfaction among officers, and strengthen community support for the police. The WPD HOT builds this support further by providing education to the community. Officer Schwiethale remembers, “When a camping ordinance was passed, [the WPD HOT] participated in a lengthy interview with the media to clarify that the ordinance was a tool to help HOT officers approach persons experiencing homelessness and get them the help they need. To date, not a single person experiencing homelessness has been arrested based on the camping ordinance.”

## Sharing the success

The success of the HOT model and other models such as CIT and Mental Health First Aid have prompted SAMHSA to formalize training for its grantees, law enforcement, and, ultimately, for a national audience. Redefining Experiences—Alternatives to Criminalization of Homelessness (REACH), a SAMHSA virtual learning tool, promotes practical, outcome-driven methods that will help end homelessness and provide concrete steps toward implementing a HOT. Learners will discover alternatives to criminalization of homelessness, including creating constructive partnerships with other stakeholder groups. Development of REACH was a consensus-driven process vetted by many federal partners and national experts. It is in the final stages of development and expected to launch in 2016.

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## LINKS TO ADDITIONAL RESOURCES

Resource	Description	Link
Chart of CoC Responses to Criminalization Question	The full list of sortable data compiled by the Law Center	Excel sheet: <a href="https://www.nlchp.org/CoCcrimdata_2015thru2017_excel">https://www.nlchp.org/CoCcrimdata_2015thru2017_excel</a>  PDF file: <a href="https://www.nlchp.org/CoCcrimdata_2015thru2017_pdf">https://www.nlchp.org/CoCcrimdata_2015thru2017_pdf</a>
Housing Not Handcuffs: Ending the Criminalization of Homelessness in U.S. Cities	This report provides an overview of criminalization measures in effect across the country and looks at trends in the criminalization of homelessness, based on an analysis of the laws in 187 cities that the Law Center has tracked since 2006. It also analyzes trends in local enforcement, describes federal opposition to criminalization, and offers constructive alternative policies to criminalization laws and practices, making recommendations to federal, state, and local governments on how to best address the problem of visible homelessness in a sensible, humane, and legal way.	<a href="https://www.nlchp.org/documents/Housing-Not-Handcuffs">https://www.nlchp.org/documents/Housing-Not-Handcuffs</a>
Housing Not Handcuffs: A Litigation Manual	This manual provides trend data on cases brought against criminalization policies, provides an overview of legal theories that have been used successfully to challenge criminalization policies and practices, and it also sets forth several important considerations for bringing litigation on behalf of homeless people. In addition, it includes numerous summaries of cases that have been brought over the years to protect the civil and human rights of homeless people.	<a href="https://www.nlchp.org/documents/Housing-Not-Handcuffs-Litigation-Manual">https://www.nlchp.org/documents/Housing-Not-Handcuffs-Litigation-Manual</a>
Tent City USA: The Growth of America's Homeless Encampments and How Communities are Responding	This report reviews the rapid growth of homeless people living in tents across the United States over the past decade, as measured by documentation in media reports, and communities' responses to them, including case studies of six communities with constructive approaches.	<a href="https://www.nlchp.org/Tent-City_USA_2017">https://www.nlchp.org/Tent-City_USA_2017</a>
Model Policies	This page shares model legislation from cities and states across the country that have implemented various constructive alternatives to criminalization practices.	<a href="https://www.nlchp.org/modelpolicies">https://www.nlchp.org/modelpolicies</a>
Police Trainings Database	This spreadsheet contains information on police departments with homeless outreach teams or training programs designed to provide tools for law enforcement on interacting with people experiencing homelessness.	Contact <a href="mailto:email@nlchp.org">email@nlchp.org</a> for access
NLCHP Criminalization Page	Additional links to materials relevant to the criminalization of homelessness.	<a href="https://www.nlchp.org/criminalization">https://www.nlchp.org/criminalization</a>
HUD Criminalization Page	HUD web page with links to materials on criminalizing homelessness.	<a href="https://www.hudexchange.info/homelessness-assistance/alternatives-to-criminalizing-homelessness/">https://www.hudexchange.info/homelessness-assistance/alternatives-to-criminalizing-homelessness/</a>
Searching Out Solutions: Constructive Alternatives to the Criminalization of Homelessness	USICH report and guidance on constructive alternatives to criminalization.	<a href="https://www.usich.gov/tools-for-action/searching-out-solutions">https://www.usich.gov/tools-for-action/searching-out-solutions</a>

Resource	Description	Link
Ending Homelessness for People Living in Encampments: Advancing the Dialogue	USICH guidance and checklists for constructive approaches to ending encampments.	<a href="https://www.usich.gov/tools-for-action/ending-homelessness-for-people-in-encampments">https://www.usich.gov/tools-for-action/ending-homelessness-for-people-in-encampments</a>
Case Studies: Ending Homelessness for People Living in Encampments	Six case studies from cities that had taken constructive steps to end homelessness for people living in encampments.	<a href="https://www.usich.gov/tools-for-action/case-studies-ending-homelessness-for-people-living-in-encampments/">https://www.usich.gov/tools-for-action/case-studies-ending-homelessness-for-people-living-in-encampments/</a>
Department of Justice Statement of Interest in <i>Bell v. Boise</i> and press release	In August, 2015, the U.S. Department of Justice submitted a statement of interest brief in <i>Bell v. Boise</i> clearly stating that “[i]t should be uncontroversial that punishing conduct that is a universal and unavoidable consequence of being human violates the Eighth Amendment. . . . Sleeping is a life-sustaining activity—i.e., it must occur at some time in some place. If a person literally has nowhere else to go, then enforcement of the anti-camping ordinance against that person criminalizes her for being homeless.”	<a href="https://www.justice.gov/opa/file/643766/download">https://www.justice.gov/opa/file/643766/download</a> Press release: <a href="https://www.justice.gov/opa/pr/justice-department-files-brief-address-criminalization-homelessness">https://www.justice.gov/opa/pr/justice-department-files-brief-address-criminalization-homelessness</a>
Department of Justice COPS Dispatch Newsletter	The December 2015 Community Oriented Policing Services Dispatch e-newsletter contains several articles useful for opening discussions with law enforcement about the constructive role it can take in ending criminalization of homelessness.	<a href="https://cops.usdoj.gov/html/dispatch/12-2015/index.asp">https://cops.usdoj.gov/html/dispatch/12-2015/index.asp</a>
Department of Justice Access to Justice Office Letter to Seattle	This letter explains why a proposed Seattle ordinance which would regulate the manner in which homeless encampments could be addressed meets constitutional scrutiny under the position taken by the DOJ in <i>Bell v. Boise</i> .	<a href="https://www.documentcloud.org/documents/3141887-DOJ-ATJ-Letter-to-Seattle-City-Council-10-13-2016.html">https://www.documentcloud.org/documents/3141887-DOJ-ATJ-Letter-to-Seattle-City-Council-10-13-2016.html</a>
Housing Not Handcuffs Model Policies	This page contains links to model legislation for the federal, state, and local level to end and prevent criminalization of homelessness and promote housing instead.	<a href="http://housingnohandcuffs.org/policy-solutions/">http://housingnohandcuffs.org/policy-solutions/</a>
Seattle Pledge	This campaign seeks to work with Seattle businesses to take a pledge to help address homelessness in the community through whatever steps the city feels able to do, for example, offering the unrestricted use of city restrooms, places where homeless people can charge their mobile devices, etc.	<a href="http://seattlepledge.com/">http://seattlepledge.com/</a>

## APPENDIX

Table based on full data obtained by Law Center (including data from CoCs where not all three years' data was available).

Table 2.

<i>Application Yr.</i> >	FY 2015	FY 2016	FY 2017
<i>Strategy Selected</i> ∨			
Engaged/Educated Local Policy Makers	63.1%	65.4%	69%
Engaged/Educated Law Enforcement	66.8%	65.4%	67.5%
Engaged/Educated Local Business Leaders	N/A	N/A	60%
Implemented Community-Wide Plans	32.1%	42.4%	41%
No Strategies Implemented	3.7% (9 CoCs)	1.3% (4 CoCs)	.9% (1 CoC)
Other	30.3%	42.3%	37%