



# **PUBLIC COMMENTS ON DRAFT COUNTY STRATEGIES TO COMBAT HOMELESSNESS**

## **with Responses from the County Homeless Initiative**

February 3, 2016

Los Angeles County's Homeless Initiative was created by the Board of Supervisors in August 2015, with a mandate to submit a coordinated set of recommended strategies for Board consideration in February 2016. The recommended strategies resulted from an inclusive, collaborative planning process, which brought together 25 County departments, 30 cities and over 100 community organizations in 18 "policy summits" between October and December 2015.

On January 7, 2016, the Los Angeles County Homeless Initiative released for public comment 47 draft strategies to combat homelessness across the region. On January 13, 2016, the Homeless Initiative hosted a community meeting to review the draft strategies.

This document includes both written and verbal comments received through January 21, 2016, the end of the public comment period. The document is organized in two sections: 1) Comments on Individual Strategies (pages 1 through 72); and 2) General Comments (pages 73 through 118). Where a single submission included comments on multiple strategies, that submission was divided by strategy, so that the comment on a given strategy appears with other comments on that same strategy.

The County of Los Angeles thanks you for your contribution to the development of the Homeless Initiative strategies and looks forward to your continued partnership in moving forward to implementation.

## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
<b>A1- Homeless Prevention Program for Families</b>		
Ascencia	This is an extremely ambitious strategy, with relatively limited resources. Recommendation: launch a pilot project to test the assumptions inherent in this strategy and factor in a robust evaluation.	Pilot project suggestion and evaluation will be considered during the implementation planning for this strategy.
Center for the Pacific Agency Family	Workgroup must include providers who work with families who are fleeing domestic violence.	Agreed. As the leads for this strategy, DPSS and LAHSA will include Domestic Violence providers in the planning process.
City of Santa Monica	Prevent Homelessness The City agrees with a strategy of preventing homelessness as discussed in the draft strategies. While the plan specifically recommends developing a comprehensive homeless prevention for families due to the existing commitment of funding for families, the City strongly recommends that the report include some commitment to scale up prevention services for all populations in the future. In Santa Monica, aging and disabled individuals are a particularly vulnerable and a growing segment of our community members who are at high risk for homelessness, and whom are among the most difficult and costly to re-house once homeless.	This suggestion will be considered in the future.
Family Crisis Center	Homelessness Prevention for Families Initial draft strategy language for which professional input is given below: "Direct the Los Angeles Homeless Services Authority (LAHSA) and the Department of Public Social Services to convene a workgroup consisting of other relevant County departments and key community stakeholders to develop an integrated, comprehensive homeless prevention program for families which draws on the Homeless Family Solutions System (HFSS) model."  Professional Provider Input for Amendment to Draft: Workgroup must include providers who have substantial credentials and experience to interface directly with homeless victims of domestic violence, homeless children (including throwaway, abandoned, and runaway preteens and teens), and homeless human trafficking victims (including both adults and children).	Agreed. As the leads for this strategy, DPSS and LAHSA will include Domestic Violence providers in the planning process.
Legal Aid Foundation of Los Angeles	Homelessness Prevention We support the County's intention to create a comprehensive Homeless Prevention Program; however, any such program should not be limited to families. The County should develop integrated systems to prevent homelessness for all at-risk groups, taking into account the challenges and opportunities specific to each population. Specifically the strategies should include better coordination and participation on the part of DPSS in any proposed strategy as well as broader commitments to more diverse, expanded and	Suggestion to create a comprehensive prevention program for all at-risk groups will be considered once funding is identified.

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	<p>more permanent streams of funding to promote better stability and seek assistance with an eye towards developing an integrated approach that does not inadvertently prioritize one group at the expense of others that are equally vulnerable. To ensure that final strategies address the broader picture of homelessness in the region and have the greatest impact, it is essential for community organizations to be involved in their development of the details and implementation. Programs to alleviate homelessness have existed for some time, but homeless individuals and the community organizations that serve them struggle to access these programs. Without involvement of frontline community organizations serving homeless individuals, the barriers to the programs will continue. In addition, the specific needs of domestic violence survivors have been left out of the equation. Specific suggestions on priority strategies outlined in the proposal include the following:            Strategy A1 – Homeless Prevention Program for Families – Funding for this program seems to be CalWORKs Single Allocation Funding and CalWORKs Fraud Incentive Funding. This sort of funding points to restrictions as to who can be served by this program. Single Allocation funding can only be used for families where the adult is eligible to participate in the CalWORKs welfare to work program. This leaves out families where the adult caretaker is disabled, timed-out or otherwise ineligible for CalWORKs or not required to participate in Welfare to Work. Those left out may be among the most needy and vulnerable. The children in these households continue to be eligible for CalWORKs. Other funding for this program should be identified to cover those families that currently would not be covered. If the County fails to take meaningful steps to prevent new households from entering homelessness, its other strategies will be undermined as resources are stretched thin by an increasing population of people who are homeless. The County’s Domestic Violence Council should be incorporated into team of collaborating agencies to address homelessness, DVC should be afforded a role in developing a comprehensive homelessness prevention program because of the role domestic violence plays in regards to women and homelessness (please see p. 8 for further discussion of domestic violence). Finally, as stated above, focusing solely on families is insufficient. The County should look for ways to expand the program beyond families to create cooperative systems for its most vulnerable households regardless of family status.</p>	<p>All families regardless of CalWORKs eligibility will be addressed through this strategy. The recommended CalWORKs fraud incentive funding can serve all low-income families which include at least one U.S. citizen or legal immigrant.</p> <p>The County’s DV Council will be consulted in the development of this program.</p>
<p>Neighborhood Legal Services of Los Angeles County</p>	<p>NLSLA strongly supports the recommended Homelessness Prevention Program for Families (A1), but believes three vital eviction-prevention strategies should be Included in the recommendations: (1) a homelessness prevention program for individuals; (2) a “good cause” for eviction ordinance for Los Angeles County; and (3) Increased protections for Section 8 tenants at risk of losing their vouchers</p> <p>1. NLSLA strongly supports the recommended homelessness prevention program for families (A1), but Believes Such a Program Should Be Extended to Single Adults. In draft recommended strategy A1, building off the work previously put forth in proposed strategy 4.1, the draft points to “eviction prevention, temporary rental subsidies, and other financial services” for families as key parts of the DPSS’s efforts to prevent families from becoming homelessness. We applaud these</p>	<p>(1) Suggestion to create a prevention program for individuals will be considered once funding is identified.            (2) This recommendation could be addressed as a policy option outside the homeless Initiative.            (3) As discussed during the Policy Summit Process, HACoLA will meet with interested</p>

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	<p>recommendations, and recommend additional funding to offer similar services to single adults to mitigate long-term homelessness, and alleviate the emergency shelter costs upon the County.</p> <p>NLSLA regularly encounters families and single adults who have been evicted for (1) being mentally or physically disabled; (2) filing complaints to the city for slum-like living conditions; and, (3) experiencing delays in receiving their GR or SSI payments or clerical errors at their bank which prevent their timely payment of rent. A recent client example includes a low-income woman whose family faced eviction simply because she misprinted the mailing address for her rent check one month (we prevented her eviction by showing she had not received proper notice). Another client was at risk of being evicted for failing to pay a \$3.61 processing fee on his rent check while simultaneously being sued by a management group that purchased the building while his litigation was pending. To make matters worse, if tenants default in their unlawful detainer cases, it shows up on their credit record and could prevent otherwise willing landlords from renting to them. Evictions such as these may be prevented provided these individuals have access to legal services at the earliest stage. We urge a recommendation to fund additional legal advocacy and case management to ensure both families and single adults like our clients do not become homeless.</p> <p>Measures to avoid evictions of single adults can alleviate burdens on shelter systems and minimize the risk of long-term homelessness. The increased expenditures in eviction prevention for individuals would be a valuable investment for the County, given emergency shelters can cost as much as \$1817 a month per individual. Of course, the true cost of homelessness is the full range of government services needed, which is considerably more than just the cost of shelters.</p> <p>2. The Draft should recommend a “Good Cause” Eviction Ordinance Experts in homelessness prevention in Los Angeles County agreed that the County should adopt a “Good Cause” Eviction Ordinance. Yet this proposed strategy was not incorporated into the draft. The absence of Good Cause Eviction is a glaring missed opportunity to stop homelessness at one of its root causes: eviction.</p> <p>At NLSLA, we see the same story over and over: tenants are evicted not for the wrong reasons, but for no reason at all. One mother and grandmother, a longtime good tenant, was given an eviction notice to vacate her home of sixteen years in a few months. She and the children could not find safe and affordable housing in such a short time, and they are now facing homelessness.</p> <p>There is a simple solution: follow the lead of cities like Los Angeles, Glendale, Richmond, Alameda, and San Diego, and adopt a Good Cause Eviction Ordinance. Prevent homelessness by simply requiring a reason to evict. There is no funding required and no negative consequences; indeed, the Housing</p>	<p>community organizations to discuss this issue.</p>

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	<p>Authority of the County of Los Angeles (HACOLA), which oversees thousands of tenants with Section 8 vouchers who have a form of good cause eviction, has not noted any rise in good faith landlords who cannot evict as a result. A Good Cause Eviction Ordinance would likely affect over 100,000 households in the County’s unincorporated areas.</p> <p>A well-drafted Ordinance would also strike a balance between landlords and tenants, permitting eviction for reasons such as taking the house off the market and a landlord moving in. As Glendale City Councilman Dave Weaver noted as that city adopted good cause, “Any landlord that is doing the right thing by their tenants has nothing to fear.”</p> <p>The draft should recommend a Good Cause Eviction Ordinance because it has already been proven to work, and because it is urgently needed to prevent homelessness.</p> <p>3. The Draft Should Recommend Increased Protections for Section 8 Tenants at Risk of Losing their Vouchers for Non-Payment of Rent</p> <p>In the Subsidized Housing portion of the Homelessness Initiative, arguably its most important part, the Housing Authorities would not agree to recommend policies that would affect them. For this reason, NLSLA circulated a minority report asking, among other things, to protect Section 8 tenants at risk of losing their vouchers. This topic was not included in the draft. Section 8 vouchers are a guarantee of permanent subsidized housing that is the best protection against homelessness. Yet people with those precious vouchers can lose them forever if they miss even one rental payment for any reason – including hospitalization or an accidental termination of public benefits – and it leads to eviction. When Section 8 vouchers are terminated, the result is often homelessness.</p> <p>The current voucher policy at HACOLA, which states that any eviction can lead to termination, has terrible consequences. For instance, we recently served a mother who got a trumped-up notice for non-payment of rent from a landlord bent on evading rent control. This dispute over a single month’s rent triggered an eviction, which put her voucher in jeopardy. This woman had to consider moving her family into a shelter to entice her landlord to drop the case and keep her record clean. Other tenants without legal representation fare even worse.</p> <p>Section 8 voucher holders should be protected from adding to the ranks of the homeless, not pushed out when they could succeed in subsidized housing. For this reason, Los Angeles County should direct HACOLA to require that tenants with Section 8 vouchers cannot lose their vouchers just because they face eviction for a single month of unpaid rent. If the eviction is due to more than one month of unpaid rent, HACOLA should have to consider mitigating factors before terminating the voucher – specifically, domestic violence, illness or disability, or other hardship that may have caused the missed rent. This</p>	

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	<p>policy would impact the over 20 thousand households with Section 8 vouchers.</p> <p>We know this policy is possible, because Housing Authorities are already implementing it – though only when they choose to do so in an exercise of discretion. Both HACOLA and the Housing Authority of the City of Los Angeles admitted this proudly during the Subsidized Housing meetings. They did not mention a single negative consequence or cost of doing so. Yet they will not memorialize this discretion into a policy that low-income tenants can rely on when facing eviction and the dire choices that come with it. Los Angeles County should direct HACOLA to enforce the simple protections outlined above. They would allow the most at-risk low-income tenants – who are the most deserving of Section 8 vouchers – to fight eviction and maintain stable housing.</p>	
Public	<p>A) Not discussed evictions. People are evicted without good cause. Often they are given only 30 days, which is not enough time to obtain replacement housing. COLA should set forth a list of reasons for evictions and enact a “good cause” ordinance, others do it, City of LA, Glendale, COLA should as well.</p> <p>B) People with Section 8 housing should be protected. They can be evicted for a one time late rent payment, even in case of emergency, COLA should protect Section 8 recipients against such strict policies.</p>	<p>A) This recommendation could be addressed as a policy option outside the Homeless Initiative.</p> <p>B) As discussed during the Policy Summit Process, HACoLA will meet with interested community organizations to discuss this issue.</p>
Public	Rent Issue, why are landlords allowed to raise rent so high?	No comment
Public	Systemic cultural competency issues “People of color are penalized, criminalized, institutionalized and or killed simply for being poor, mentally ill or just black. Not really true about trying to deal with homeless issues for black people.”	No comment
<b>A2- Discharge Planning Guidelines</b>		
Ascencia	<p>The County promised to implement discharge planning guidelines over 10 years ago. This was incorporated into documents submitted by LAHSA to HUD to secure tens of millions of dollars. The promise was to fulfill a commitment and align the County actions with federal priorities for ending homelessness. Given this strategy, it appears the discharge planning guidelines were never created or adopted. What is the County’s plan to ensure accountability that this will, in fact, be done this time?</p>	<p>The Homeless Initiative Planning Process included mainstream health, criminal justice and social services departments to an unprecedented degree. The resulting recommended strategies focus heavily on the contribution of those mainstream departments to combating homelessness, which includes reducing the number of individuals who become homeless upon discharge. Many of the strategies focus on this issue, and</p>

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		there is a significant level of associated recommended funding. The CEO and all of the involved County departments will continue to work together closely to ensure the successful implementation of this and all of the other strategies.
Legal Aid Foundation of Los Angeles	Discharge Planning Guidelines – States that the Department of Health Services is to convene a workgroup consisting of the Department of Children and Family Services, Department of Mental Health, Department of Public Health, Sheriff, Probation Department, Veteran’s Administration, LAHSA and the Hospital Association of Southern California and key community agencies to develop and enhance Discharge Planning Guidelines. The Department of Public Social Services is not named among the County Departments to participate in the work group. Key to a successful discharge from foster care, criminal justice institutions and hospitals are public benefits that allow people to pay for food, shelter and obtain medical care. DPSS should be in this work group and contact with the Social Security Administration should also be made to plan for referrals to SSA for benefits as well.	DPSS has been added.
Public	Private hospitals have been dumping discharged patients at our winter shelter pick –up site. Can they be compelled to work with system? What incentives for them to participate?	Through the Hospital Association of Southern California, private hospitals will be encouraged to participate in the development and implementation of the guidelines.
Public Counsel	<ul style="list-style-type: none"> <li>• The discharge planning guidelines should include specific guidelines for accommodating people with mental disabilities. Discharge planning for this population will usually require a skilled case manager. Disability accommodations should be one of the performance metrics.</li> <li>• There is no budget associated with this strategy. In fact, the strategy provides that “[t]he cost of implementing (emphasis added) the guidelines will need to be addressed separately by each department.” Even if the departments are required to bear the costs of staff time involved in developing the Discharge Planning Guidelines, the implementation of the guidelines should not be subject to department funding. The County must make a commitment that the services at the end of the discharge plan, including appropriate case management, permanent supportive housing, and substance abuse treatment, are in fact available at the time they are required by the person being discharged. Any gap between discharge and provision of services makes it less likely that the discharge plan will be effective. The County should consider funding the supportive housing and services necessary to carry out a comprehensive discharge planning program by issuing a bond in addition to the bond used to fund the construction of the new jail facilities. Additional bond funds will keep people out of jail and reduce stress on the Sheriff and the jail system.</li> </ul>	<ul style="list-style-type: none"> <li>• Will be considered during the implementation planning process.</li> <li>• Various other strategies address some of the costs that will be associated with implementing the guidelines that will be developed.</li> <li>• Stakeholders and community experts will be consulted in the development of the guidelines.</li> <li>• The implementation target for this and all other strategies that are not identified as “Phase I Strategies” will be</li> </ul>

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	<ul style="list-style-type: none"> <li>The workgroup should include stakeholders in the communities being served and subject matter experts.</li> <li>The recommendation is only to convene a workgroup to develop guidelines. No timeframe is provided.</li> </ul>	included in the first quarterly report to the Board of Supervisors in May 2016.
Public	What about mental health clients under a 5150 hold being discharged without a place to go?	If clients are in a hospital, they will be addressed in the development of the hospital discharge guidelines.
<b>A3 – HOUSING AUTHORITY FAMILY REUNIFICATION PROGRAM</b>		
Los Angeles Mission	Section 8 and Rapid Rehousing Reliance A-3 Section 8 vouchers and rapid rehousing dollars are great but there needs to be an intensive marketing program to engage landlords or else build, buy or master lease units in the marketplace that can then be leased for Section 8 or rapid rehousing. This is applicable to all initiatives (B3, B5, et.al.) using these dollars over the former transitional housing models.	To be considered during implementation planning.
<b>A4- DISCHARGES FROM FOSTER CARE AND JUVENILE PROBATION</b>		
Ascencia	One of the defining features of people living in poverty and homelessness is the lack of planning. As soon as a child enters the foster care program there needs to be a view to the long-term. The metric states the number of transition plans completed six months before discharge, yet the narrative says transition planning should begin six months prior. Transition planning should always be an element of case management. Formalizing it in a plan should be the natural progression of work done throughout the contact with the youth. Most parents do not wait six months before high school graduation to ask their children what they want to be when they grow up. Why would we do that with our foster youth?	Convening the transition planning meetings 6 months before discharge will be twice as soon as the current practice of convening these meetings three months before discharge. The impact of this change will be assessed following implementation. Additionally, in order for a plan to be completed 6 months before discharge, some level of transition planning will need to begin before then.
Covenant House California	Allowing youth to ‘double-up’ in apartments or houses increases their chance for success as they move from transitional existence to permanent, sustainable, community-living situations. Housing Choice and other voucher programs do not allow for this roommate model of living, one that is particularly useful for the youth population. The peer-support approach to services has shown to be extraordinarily successful	Various shared housing options will be considered during implementation planning.

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	in encouraging engagement from the youth population, and we ask that the County consider advocating for allowing homeless youth to use permanent housing vouchers in shared housing models. Thank you so much for your work on these issues.	
Covenant House California	As it pertains to youth, and the Transition Aged Youth population in particular, ensuring a wide variety of housing solutions is crucial to their sustainable success. Transitional living programs take into account the complex developmental needs of the population, addresses the trauma they have experienced before they were homeless, while they were homeless, and, most importantly, give them time to work with staff and community stakeholders in preparation for permanent housing. There is no argument that Housing First is a best practice for the adult homeless population, and to be clear, there are youth for whom it is indeed the best path from the street. In the interest of being comprehensive in our approach to youth homelessness, though, we urge the County to support a full range of housing options that includes transitional living programs. Thank you so very much for all of your continued work.	We agree. The goal will be for each client to be placed into the type of housing that works best, based on his/her individual circumstances.
Legal Aid Foundation of Los Angeles	Foster Care Discharge – transition planning should include referral for interim assistance through public benefits such as General Relief, SSI, etc. DPSS should also be a key agency in this strategy.	Agree. DPSS has been added as a collaborating agency.
Public	There needs to be more housing and supportive service options (especially short term housing while long term housing options are developed) for foster and probation youth. Being cognizant that foster youth have individualized needs and challenges, a variety of housing options and enhanced services should be considered including additional services and funds to cover hard costs when making accommodations of individualized needs and appropriate intensive supportive services (e.g., parenting youth or youth with mental health needs) Wraparound services should be offered to all youth, not just those returning to families. Youth entering into TAY Housing are almost more vulnerable and need the support as well. The Transition plans should be specific to identify the next steps to take in education plan as youth often can't identify the steps on their own. Assessments and placement reviews for SILPS should be considered in any NMD Placement. Placements should be determined based on where the youth will be the most successful (not placing in any housing option) from SILPs, single site setting, scattered site setting or host family homes. Data collection must be streamlined with other data requirements including reports, forms that are often duplicative and not user friendly/accessible. An open source database that can be used for multiple interfaces (e.g., DCFS, HMIS, and DMH) or that can handle importing data from external databases needs to be a priority before creating additional data requirements.	To be considered during implementation planning.
<b>B. SUBSIDIZE HOUSING</b>		
City of Santa Monica	The housing subsidy strategies developed are innovative and thoughtful. The un-addressed challenge for many communities on the Westside is that current subsidy levels are inadequate to bridge the amount between what a household can pay and the actual market rents. As these programs evolve from pilot to permanent, the City would like to see County consideration of local payment standards based on rental	The appropriate payment standards for the various strategies which involve rental subsidies will be addressed during

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	<p>market surveys</p> <p>Additionally, while a useful short-term strategy, dedicating turn-over Housing Choice Vouchers for Permanent Supportive Housing reduces the availability of vouchers over time for non-chronically homeless people and those who are at imminent risk of homelessness and in need of long-term financial assistance to maintain their housing. The City suggests an alternative approach of pooling existing surplus vouchers to create new PSH vouchers, which was successfully implemented by the City of Santa Monica, City of Los Angeles, County of Los Angeles, and Pomona Housing Authorities as part of the Countywide Continuum of Care in 2014.</p>	<p>implementation planning.</p> <p>Any opportunity to pool any “existing surplus vouchers” for PSH will be explored during implementation planning.</p>
Public	<p>Bottom line necessity for getting people out of “overnight programs and transitional programs”. Need to get project-based subsidies for taking over small rental units that can help with all, but our emphasis is on the underserved adult individual males and females in a number of sub-points under “B”. Cities should be encouraged to work at “development” of small apartment building – for permanent apartment living to be run by groups like ours that provide services. Laremond Homeless Advocacy Program (HAP) a program of Inland Valley Hope partners (Pomona)</p>	No response
<b>B1 – PROVIDE SUBSIDIZED HOUSING TO HOMELESS DISABLED INDIVIDUALS PURSUING SSI</b>		
Ascencia	<p>This strategy assumes that homeless individuals on SSI can afford market rate housing. This is contrary to all housing-related data for Los Angeles County. The level of subsidy would certainly decrease once an individual moves from GR to SSI, but only a very lucky few can afford an unsubsidized unit.</p>	<p>The goal will be to place individuals served under this strategy in housing with a cost of no more than \$600/month. During the Second Policy Summit on SSI Advocacy, the consensus of the participants was that an SSI recipient could live decently if his/her rent did not exceed \$600/month.</p>
Hospital Association of Southern CA	<p>This strategy identified as a priority maximizes the opportunity to enroll individuals who are more likely to have a chronic health and/or mental condition. This would greatly assist individuals in terms of stability and reintegration back into the community while their application is processed.</p>	No response
Los Angeles Christian Health Centers	<p>Hello, I previously submitted this comment re: subsidized housing: While efforts to address the lack of housing stock are commendable, there seems to be at least one category of individuals whose housing needs are not being addressed: those who are disabled and fall into the category of a VI-SPDAT score 5-9 (acuity 2). These individuals are disabled and receiving SSI, but cannot afford market rate or affordable</p>	To be considered during implementation planning.

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	<p>housing units (\$500 or more a month in rent). However, because they only have one disability, they are not prioritized for Permanent Supportive Housing and since there is not enough PSH, they have very limited chances of ever being matched to one of these types of units. The recommended housing intervention is Rapid Rehousing, but RRH is a short term subsidy. Persons who are disabled are by definition, unable to work, which means their income will be fixed (SSI=\$889.40 a month). When the short term subsidy ends, they will be unable to afford the rent and will end up back in homelessness. Disabled individuals on SSI need an ongoing housing subsidy to maintain housing in the Los Angeles rental market. What seems to be the most viable option is to allocate Project Based Voucher units to these individuals. Increasing the number of PBV units will provide a housing resource for those who are disabled but not high acuity. This will also help to ensure that all PSH units are matched to individuals of high acuity. I would like to add a follow up suggestion. I believe the County should advocate with HUD to have some HUD turnover subsidized units allocated to homeless disabled persons. HUD's properties are managed by LOMOD. Founded by the Housing Authority of the City of Los Angeles (HACLA) in December of 1973, Los Angeles LOMOD's mission is to provide and support good quality housing for low-income families, seniors, and people with disabilities.</p> <p>In January 2003, the U.S. Department of Housing and Urban Development (HUD) approved Los Angeles LOMOD Corporation's application to be the Contract Administrator for selected project-based Housing Assistance Payments contracts in ten Southern California counties. Below is the list of the counties:</p> <ul style="list-style-type: none"> <li>• Los Angeles, Kern, Imperial, Orange, Riverside, San Bernardino, San Diego, San Luis Obispo, Santa Barbara, Ventura</li> </ul> <p>LOMOD is currently responsible for oversight of 715 amounting to over 47,572 affordable housing units. I believe that LOMOD turnover units should be allocated for homeless disabled individuals, but this will take advocacy.</p>	
Public	<p>Caution against making the assumption that \$500.per month will allow disabled adults to live comfortably; this will not lift them out of poverty. They need long term assistance.</p>	<p>The goal will be to place individuals served under this strategy in housing with a cost of no more than \$600/month. During the Second Policy Summit on SSI Advocacy, the consensus of the participants was that an SSI recipient could live decently if his/her rent did not exceed \$600/month.</p>

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Public	Strategy stated most SSI recipients are not homeless; however 30/40% of those homeless does or can get SSI. Did not see shared recovery housing as part of the strategy, and it is important in the planning process for everyone receiving SSI	Shared housing is one of the housing types that will be pursued as part of the implementation of this strategy.
Public Counsel	<p>Recouping housing costs through Interim Assistance Reimbursement (IAR) helps to address the sustainability issue raised above. However, we are concerned about the negative impact on the SSI recipient who may have needed the retroactive payment for other expenses. We would recommend that the Board consider a percentage cap on the amount of IAR that it recovers from each individual.</p> <p>The SSI approval process takes time and, if the application initially is not approved, could last for two years or more while exhausting the reconsideration and appeals process. A longer approval period will mean a longer time for the County to subsidize housing and a larger sum of retroactive benefits that the SSI recipient will have to surrender to the County. For this reason, we strongly encourage the County to utilize experienced individuals with a proven record of successfully obtaining SSI for homeless individuals as set forth above.</p>	<p>Recommendation not accepted. With the recovery of the housing subsidies funded by the County, the individual will be in the same position as if the SSI application had been approved immediately upon submission.</p> <p>Through Strategy C4, the County intends to secure SSI advocacy contractors with a proven record of success.</p>
<b>B2 – EXPAND INTERIM ASSISTANCE REIMBURSEMENT TO ADDITIONAL COUNTY DEPARTMENTS AND THE LOS ANGELES HOMELESS SERVICES AUTHORITY</b>		
Legal Aid Foundation of Los Angeles	<p><i>Subsidized Housing</i></p> <p>The role of government subsidies and benefits programs in securing housing stability cannot be overstated. The extremely high rent burden across the region has most certainly only worsened prospects for homeless families and individuals to secure permanent housing and prevent homelessness in the first place. We applaud the County’s commitment to coordinate all available subsidies to match specific needs of households struggling to be housed. More can be done, however, to ensure maximum benefits are received by those who need them most. The following comments on priority strategy areas suggest ways in which the overall effectiveness of this approach may be improved:</p> <p><input type="checkbox"/> Strategy B2 – Expand Interim Assistance Reimbursement to Additional County Departments and the Los Angeles Homeless Services Authority - This strategy identifies more agencies that could theoretically lay claim to successful SSI applicant’ retroactive benefits. Homeless disabled and aged people who have been waiting months and possibly years for their SSI applications to be approved are entitled to as much of their retroactive benefits as they are able to receive. They have debts to repay and housing to set up. They will need their retroactive benefits to cushion them while they look for suitable permanent housing. They will have to pay security deposits, first and last month rent, set up utilities, etc. and will need their retroactive benefits to make sure they are able to get into stable housing. To be effective, any</p>	Recommendation Not Accepted. The only payments that will be recovered through the Interim Assistance Reimbursement process are payments for basic living expenses for which the individual would have utilized their SSI benefit if their SSI application had been approved sooner.

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	strategy must include the opportunity for retro payments to help ensure that newly approved SSI recipient get and remained housed.	
Public	Other continuums of care should be eligible for this.	Will be considered during the implementation planning process.
<b>B3- PARTER WITH CITIES TO EXPAND RAPID REHOUSING</b>		
Center for the Pacific Agency Family	<p>Comment: Though it's true that HUD is de-emphasizing transitional housing, HUD's shifting policy priorities are not a one-size-fits-all approach. HUD has yet to present any research showing that rapid re-housing is more effective for victims of domestic violence than transitional housing.</p> <p>Recommendation: The plan should explicitly acknowledge that families fleeing domestic violence are included in the group who face high barriers that impact housing placement. The strategy document needs to better explain under what circumstances and for which populations transitional housing will remain an appropriate intervention, including for domestic violence victims. Transitional housing should be recognized as a necessary and best practice for victims of domestic violence as distinct from rapid re-housing and Housing First models for other homeless populations.</p> <p>Recommendation: Strategies for rapid-rehousing should ensure broad, flexible access to these expanded resources. This flexibility is vitally important because all of the HUD Continuum of Care dollars that have been reallocated to rapid re-housing are statutorily restricted to homeless persons living on the streets or in emergency shelter; homeless persons who wish to prevent homelessness or who are in transitional housing are NOT eligible to be assisted by those resources. Additionally, many DV victims often cannot maintain housing stability because, once "rapidly re-housed," they must continue to flee from their abuser. Rapid re-housing vouchers must provide the flexibility to move when safety is threatened.</p>	Language was added to explicitly acknowledge that rapid re-housing is not the most appropriate type of subsidized housing for all domestic violence survivors.
Downtown Women's Center	<p>DETAILED RECOMMENDATIONS</p> <p>B3 Partner with Cities to Expand Rapid Rehousing</p> <ul style="list-style-type: none"> <li>• Add Community Based Organizations/Housing Providers to "Collaborating Agencies".</li> <li>• Caution all funneling of rapid rehousing dollars through lead Coordinated Entry System Lead Agencies. Add some competitive contracts through LAHSA for Rapid Rehousing programs.</li> </ul>	<p>Community-based organizations and housing providers added to the list of Collaborating Agencies.</p> <p>Distributing of funding will be addressed in the implementation planning process.</p>
Downtown Women's center	We recommend that there be more dedicated funding streams for unaccompanied women e.g. the \$2 million in County funding recently granted to the Department of Health Services for rapid re-housing for women.	Specific recommendation not incorporated, but the needs of unaccompanied homeless women

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
		will be addressed during the implementation planning process.
Public	<p>I was recently approached by a family who has recently become homeless and was inquiring about resources that would help them pay for furniture storage. Unfortunately, I didn't have any resources to offer. The current DPSS Moving Assistance (MA) Program will help pay for moving expenses up to \$2000 (moving truck rental, not for storage fees) and the purchase of a stove and or refrigerator (not to exceed \$405).</p> <p>I would like to suggest creating a program that will help homeless households to pay for storage fees (or expanding the MA program to include storage fees) for a period of time while they are able to secure permanent housing.</p> <p>When a family becomes homeless, they have nowhere to store large essential household items that are costly to replace once they secure permanent housing, making the transition all that much more difficult and expensive for a family with limited/low income. These items include but are not limited to: beds, sofas, tables, chairs, refrigerators, stoves, washers and dryers. The size of the storage unit could be determined by the family size. For example, for a family of 4, a storage unit that holds items for a one or two bedroom apartment would be adequate. The storage period could be for a maximum of 12 months or as deemed appropriate. Providing this type of homeless aid payment will ease the financial burden of homeless families as they struggle to transition out of homelessness.</p>	This suggestion will be addressed in the implementation planning for this strategy.
Family Crisis Center	<p>Partner With Cities to Expand Rapid Re-Housing</p> <p>Initial Draft Strategy Language for which Professional input is Given Below: "Rapid re-housing is the most effective and efficient intervention for more than 50 percent of homeless individuals and families based on available data. The success rate for permanent placement is higher and recidivism rates are lower than other forms of housing interventions. However, it is not the best intervention for those who have been chronically homeless and/or face high barriers that impact housing placement."</p> <p>Comment on Draft Strategy for which Professional Input is Sought : Rapid re-housing is most often not an appropriate intervention for homeless victims of domestic violence, homeless human trafficking victims whether adults or and children, or homeless children in general (including but not limited to preteens and teens). The allocation and/or re-directing of funds away from emergency and transitional programs put in place to protect these populations creates a dangerous precedent.</p> <p>Professionals in the field, numerous California statutes, and even HUD have acknowledged that transitional housing (and emergency response) is an appropriate, life-saving, necessary, and effective intervention for subpopulations of the homeless, including victims of domestic violence and human trafficking, and including children.</p>	Language was added to explicitly acknowledge that rapid re-housing is not the most appropriate type of subsidized housing for all domestic violence survivors.

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*Responder	Comment	Response
	<p>Professional Provider Input for Amendment to Draft: The plan should explicitly acknowledge that victims of domestic violence, human trafficking victims and youth face high barriers that impact housing placement and recognize that transitional housing is a necessary and best practice for those populations.</p> <p>The strategy document needs to include a separate and distinct provision for transitional housing, to explain that transitional housing will remain an appropriate intervention for victims of domestic violence, human trafficking victims and children and make provisions to fund those interventions.</p> <p>Professional Provider Input for Amendment to Draft: Strategies for rapid-rehousing should ensure broad, flexible access to these expanded resources. "Rapid" is not, in all cases, best, especially when "rapid" can and does lead to perpetrator contacts due to the confidentiality challenges of point-of-entry local strategies, shared client information, and multiple agency hands in highly sensitive and high-risk cases (where protection is compromised and care is diminished, not improved). This flexibility is vitally important because all of the HUD Continuum of Care dollars that have been reallocated to rapid re-housing are statutorily restricted and are overwhelmingly inaccessible to victims of domestic violence and their children and human trafficking victims.</p>	
Hospital Association of Southern California	Program can potentially benefit 50 percent the of non-chronically homeless families, individuals and youth to be quickly re-housed and stabilized in permanent housing through time-limited financial assistance, case management and targeted support services.	Comment noted.
Neighborhood Legal Services of Los Angeles County (NLSLA)	<p>NLSLA applauds the comprehensive allocation of funds to rapid re-housing, and the creative recommendation to partner with cities to fund rapid re-rehousing. This recommendation demonstrates agreement on the merits of rapid re-housing: it is less costly than emergency shelter, and more effective for lower-barrier populations who need a short term bridge to stabilize their lives.</p> <p>Our organization serves countless individuals facing eviction who stand to benefit from an accessible and well-funded rapid re-housing system. For example, we currently represent a grandmother, her daughter, and two minor grandchildren, who are Section 8 recipients. Fighting their case to trial poses severe risks: loss of their Section 8 voucher, and an adverse credit record which may prevent them from finding future housing. While they are willing to take their voucher elsewhere, they cannot pay first and last month's rent and a deposit. A meaningful rapid re-housing system ensures that this family retains their vital voucher, and escapes homelessness.</p> <p>A success story from the Federal Homelessness Prevention Rapid Re-Housing program, or HPRP, highlights rapid re-housing's potential to put families on a path toward long-term success when rental assistance is coupled with case-management. Danni, a single mother in Tacoma, Washington, lost her job and housing during the economic downturn. Through HPRP, she received utility and rental assistance to move into a 2-bedroom apartment. She created a housing stability plan with her housing specialist, and identified her goal of becoming a certified nursing assistant. Further, with the help of her housing</p>	Funding recommendation not incorporated at this time; rapid re-housing programmatic details will addressed during implementation planning.

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	<p>specialist, Danni found a full time job, applied for a scholarship, and arranged her hours so she could attend school. She graduated from school and HPRP after five-months of assistance, and achieved gainful employment and long-term stability.</p> <p>Danni's story illustrates rapid-re-housing at its best: a coordinated system of utility, rental and move-in assistance, and supportive services to assist recipients to stabilize their permanent housing. Our experience as an HPRP site in 2009-2010 showed that without supportive services, some families who received one-time financial assistance were unable to sustain long-term housing. Thus, while we commend the significant allocation of one-time funds to rapid re-housing, and agree cities should take a funding role, we encourage the Commission to (1) recommend a long-term funding structure, and (2) include recommendations regarding the structural elements of a coordinated rapid re-housing system, including: easy access points, fair guidelines for eligibility, and minimum standards of supportive and follow-up services.</p>	
<p>People Assisting the Homeless</p>	<p>For years, since the conclusion of the Homelessness Prevention and Rapid Rehousing Program (HPRP) in 2012, the lack of significant rapid rehousing funds for single adults has severely impacted our ability to help a huge percentage of the homeless population access permanent housing in an efficient time frame. This tremendous investment, if led by the County and fully supported by cities within the County, will significantly reduce not only the number of individuals experiencing homelessness, but also the length of time it takes for someone to exit from homelessness.</p> <p>That said, in planning for the implementation of rapid rehousing programs, it is important to include ample funding for supportive services, which should extend (at least on some scale) beyond the point when the subsidy ends. Even when fully using evidence based practices for case management in rapid rehousing (such as the Critical Time Intervention Model), the time that the subsidy fully ends is often the time when people need services the most. There needs to be a transition period that provides a significant level of case management for at least few months after the individuals are paying rent independently, and then remains available as a safety net so that people have support in case they enter crisis again. Such services will greatly reduce the number of people who fall back into homelessness - and will thus reduce the ongoing impact on our system</p>	<p>This will be discussed during implementation planning.</p>
<p>Public</p>	<p>Private landlords are a crucial piece of ending homelessness either through Section 8 vouchers, Rapid Re Housing or scattered site apartment rentals for vulnerable clients. The County should create a strategy on how they can support more landlords to rent to vulnerable clients through nonprofit organizations (as the B4 Strategy on Facilitating Utilization of Federal Housing Subsidies) and supporting compliance on regulatory requirements or facilitating other tax credits to incentivize private partnership.</p> <p>In order to create a coordinated system, the County and Cities must have a streamlined contracting system that does not put the administrative and data burden on nonprofit organizations. With additional meetings, data reporting and collection, these are not reimbursable activities and put the burden on</p>	<p>This will be discussed during implementation planning.</p>

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## County of Los Angeles Homeless Initiative Public Comments

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	already stretched and under-resourced nonprofit organizations. Any collaborative efforts need to reimburse nonprofits for the work they perform not based on available funding (as reflected in the November 3, 2015 OMB Board Motion) and the County and joint authorities (LAHSA) must cover the indirect costs and/or fully fund activities	
Public	After reading through all of this information, it is clear to me that we are almost completely avoiding the real issue, and that is the cost of housing. No family receiving CalWORKs can afford to rent housing in LA County (or San Bernardino County). A family with 2 children receives about \$600 per month, rent for a one or two bedroom apartments are upwards of \$900 per month. Without a committed landlord community, willing to take some losses, this problem seems insurmountable. In addition, the money that is being talked about is, for the most part, already committed to other services, which means that those services would not be available if the funding is diverted.	Comment noted.
Public	Encourage a meaningful, accessible, well-funded rapid re-housing and sustainable long term funding.	Comment noted.
Public	Fully supportive of increasing RRH but I am concerned with the lack of available PH stock. We need a strategy to 1) increase the supply of PH through landlord meetings – call to action and 2) develop more units of PH. The second strategy is more long term but the first – increasing landlord willingness to open supply – is easier and should be championed by the County. We also need to encourage shared housing market rate not just share to maximize resources.	Some of these concerns are addressed in Strategy B4 – Facilitate the Utilization of Federal Housing Subsidies and B8 – Housing Choice Vouchers for Permanent Supportive Housing.
Public	Rapid re-housing is a “best practice” and yet it is not the only “best practice” for families experiencing homelessness. Rapid re-housing is still dependent on short term housing while families are being re-housed. Shelter and short term housing/vouchers are less than ideal options. Transitional housing is still very successful and a very best option for families while they are being rapidly re-housed. Transitional housing is also the “best practice” for women and children who are homeless as a result of domestic violence. Transitional housing can reduce costs over the long term as it truly breaks the cycle and empowers families to not be reliant on subsidies long term.	Language was added to explicitly acknowledge that rapid re-housing is not the most appropriate type of subsidized housing for all domestic violence survivors.
Public	Speaker was concerned about the interplay between the strategies, i.e. evictions are on the rise, but we recommend enticing landlords to rent to low income residents.	Strategy B4 – Facilitate the Utilization of Federal Housing Subsidies partially addresses this concern.
Public	The funding set aside for homeless families seems inadequate given the ending of the F-5 program and the exponential increase in unsheltered homeless families reflected in the PIT count and the traffic in the FSCs. At least \$5 million per year designated for families will be needed just to keep the status quo – which should not be our goal.	Recommendation incorporated: \$5 million in rapid rehousing funding is earmarked for families.
Public	This strategy should consider funding host homes for runaway/throwaway youth (non-system connected) to prevent this district population from becoming homeless or experiencing long bouts of homelessness so that youth can have stable housing and complete their educational goals.	This will be discussed during implementation planning.

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## County of Los Angeles Homeless Initiative Public Comments

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Public	Why Homeless Family Solution System is not included?	:\$5 million in rapid rehousing funding is earmarked for families.
Public	I am a formally homeless individual. Who holds the match funding for rapid housing?	The County is inviting cities to provide a \$500/month match for rapid re-housing for city residents.
Public	I am a housing navigator for DMH. Matching homeless people with housing takes too long. Have expos like what was done for the veterans (VASH)	Comment noted.
Public	I am encouraged by B3. I recommend carving out more (at least \$5million/year) for rapid housing. This Supervisorial District has 34% homelessness in LA County.	Recommendation not incorporated. Over one-third of all recommended one-time funding for the Homeless Initiative strategies is recommended for rapid re-housing.
<b>B4 – FACILITATE UTILIZATION OF FEDERAL HOUSING SUBSIDIES</b>		
Public	Private landlords are a crucial piece of ending homelessness either through Section 8 Vouchers, Rapid Re Housing or scattered site apartment rentals for vulnerable clients. The County should create a strategy on how they can support more landlords to rent to vulnerable clients through nonprofit organizations (as the B4 Strategy on Facilitating Utilization of Federal Housing Subsidies) and supporting compliance on regulatory requirements or facilitating other tax credits to incentivize private partnership In order to create a coordinated system, the County and Cities must have a streammed contracting system that does not put the administrative and data burden on nonprofit organizations. With additional meetings, data reporting and collection, these are not reimbursable activities and put the burden on already stretched and under-resourced nonprofit organizations. Any collaborative efforts need to reimburse nonprofits for the work they perform not based on available funding (as reflected in the November 3, 2015 OMB Board Motion) and the County and joint authorities (LAHSA) must cover the indirect costs and/or fully fund activities	Suggestion not incorporated.
Downtown Women's Center	Facilitate Utilization of Federal Housing Subsidies • DWC supports this policy. Landlords need additional incentives beyond guaranteed rent through a voucher, especially home repair guarantees and coverage of rent while waiting for PHA inspections.	Comment noted.
Public	During my 26 years of work in homeless services agencies in Los Angeles, city and county, I have participated in numerous efforts to eliminate or drastically reduce homelessness. Obviously, none has worked as well as promised or desired. Almost all proceeded from the demand side: better shelters, more	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

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	transitional programs, more subsidized housing, more treatment facilities. Yet, the homeless numbers have not substantially decreased. One of the issues I have seen over and over is the reluctance of landlords to house the homeless, particularly those whose income is limited and vulnerable and who come with the stigmas of poor credit and history of eviction. In other words, its on the supply side that problems occur to limit the effectiveness of demand side solutions. I have frequently wondered if landlord incentives would work to create a larger pool of permanent housing or the homeless. By incentives I am thinking of a range of options, such as tax abatement for landlords whose total tenant list includes 10% formerly homeless; eviction prevention services for participating landlords; public repair and rehab services for apartments occupied by the former homeless. The cost of opening up more housing in existing buildings would certainly be less than the construction of new housing solely for the homeless and it would accomplish an integration of the homeless into the community, a goal currently not well served by the placement of new homeless housing in predominantly poverty areas.	
Public	Landlord engagement – we’ve had a really difficult job getting people with vouchers into housing. Are landlord incentives enough? Seems like more is needed. Can a landlord summit be arranged to recruit support? Can anything be done to help with credit repair?	Comment noted.
Public Counsel	Some of our clients with housing choice vouchers (HCV) have experienced difficulty finding owners willing to accept them. Therefore, more incentives are needed to encourage and preserve landlord participation in the HCV program. We applaud the County’s recognition that owners need such incentives and support the proposed funding outlined in Strategy B4. However, we are concerned that the County’s efforts to prioritize chronically homeless individuals to receive HCVs that become available through routine turnover will not result in successful placements beyond the first two years. This is because the funding incentives identified in Strategy B4 are limited to only two years and the County Plan does not provide any other incentives for owners to accept placements that they may perceive as more challenging given the chronic nature of the individuals receiving the turnover HCVs. Accordingly, we propose that Strategy B4 continue for longer than two years.	The need for these incentives is tied to the current, very tight housing market. If circumstances remain the same in the future, these incentives could be extended, subject to available funding.
United Way of Greater LA	Add move in dollars as an eligible use (and grow the amount)	Security deposit assistance has been added. Move-in assistance is not being included at this time due to limited funding.
<b>B5- EXPAND GENERAL RELIEF HOUSING SUBSIDIES</b>		
Housing Works	GR Housing subsidies are NOT a credible solution. There are very limited options for housing that rents for \$575/mo.	Most GR housing subsidies are currently used, and the current subsidy amount is \$400/month, plus \$100/month from the GR

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		<p>participant. Under this strategy, the maximum subsidy will increase to \$475/month plus \$100/month from the GR participant, which should modestly increase the housing situations in which these subsidies could be used.</p>
<p>Legal Aid Foundation of Los Angeles (LAFLA)</p>	<p>Expand General Relief Housing Subsidies – When the GR Housing Subsidy program was first implemented, it was envisioned that the savings from getting people off of GR and onto SSI, along with the collection of the IAR, would pay for the expansion of the program from 1100 subsidies to 10,000 subsidies in 5 years. And even though research showed that the program was successful and achieving the goals set out, the County did not expand the project as anticipated. Specific goals and timelines to expand the program must be set and commitments must be kept and the savings and Revenue generated from the collection of IAR must not be diverted to other uses. Dedicated funding must be allocated in advance if this proposal is to get off the ground. In addition, there remains the issue of whether the subsidy amount (increased to \$575, combined) will allow GR recipients to actually secure housing. The 2016 HUD fair Market rent for the Los Angeles area is \$947 for an efficiency and \$1,154 for a one bedroom. Therefore in order for the subsidy to be useful, the County should explore shared housing strategies, and be aware of potential barriers like the City of Los Angeles’ proposed Community Care Facilities ordinance.</p>	<p>Shared Housing is currently allowed within the program design. Ongoing funding for the expansion of this program is included in the recommended strategy.</p>
<p>Neighborhood Legal Services of Los Angeles County</p>	<p>Expand the General Relief Housing Subsidy and Case Management Project (“GRHSCMP”) NLSLA believes that successful SSI advocacy programs are inextricably tied to enhancing GR housing subsidies from \$400 to \$475 and expanding the number of available subsidies for disabled homeless GR participants pursuing SSI (B5). As discussed below (see page 12), housing makes a difference in successfully linking someone to social security benefits. In Los Angeles, research showed that those with GR to SSI housing subsidies were 10 times more likely to apply for SSI, and were 2.5 times more likely to be approved for benefits than those without housing. Without housing stability, each address change reduced the chances of applying for SSI by 17%. Importantly, providing subsidized housing for GR recipients potentially eligible SSI benefits can substantially save the County money; as much as 50% reduction in country service costs per participant.</p> <p>We support the recommendation to enhance the GRHSCMP subsidy and to align it with a rapid re-housing model. These recommendations indicate a recognition that many severely disabled people end up on the streets: 36.8% of all homeless adults in the Homeless Management</p> <p>Information System (HMIS) have a disability, and only 10-15% of homeless people received benefits from SSI and SSDI assistance in 2010. (2010 Annual Homeless Assessment Report).</p>	<p>Comment noted.</p>

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## County of Los Angeles Homeless Initiative Public Comments

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	So that the County can recover and reinvest the housing subsidy for additional recipients, we also recommend that the County expand the Interim Assistance Reimbursement (IAR) to additional County Departments (B2).	
<b>B6- FAMILY REUNIFICATION HOUSING SUBSIDY</b>		
Neighborhood Legal Services of Los Angeles County	Finally, we applaud the recommendation to create a family re-unification housing subsidy for compliant DCFS families whose only barrier to reunification is housing. The provision of concrete services, such as assistance with housing and utilities, is an important aspect of successful family reunification. While we commend the sustainable funding structure for this rapid re-housing subsidy, however, we once again encourage the inclusion of recommendations regarding the structural elements of this program. As families who interact with DCFS face unique barriers to sustaining long-term housing, the recommendations should include set-aside funds for specialized case-management.	This recommendation will be addressed during implementation planning.
Public	Why is this not included in HFSS why is it segregated out? Is it so that DCFS is able to participate in the funding?	DCFS and LAHSA are the co-lead agencies for this strategy. The role of HFSS will be addressed during implementation planning.
Public	No strategy to place families and individuals into shared living arrangement. We can't build enough housing.	Shared housing may be allowable as part of this strategy, but shared housing is generally a more viable option for individuals, than for families.
<b>B7- INTERIM/BRIDGE HOUSING FOR THOSE EXISTING INSTITUTIONS</b>		
Ascencia	Ideally there will be opportunities for providers outside the transitional housing network to participate in this effort to expand interim housing. Smaller scale projects stand a great likelihood of getting sited, because their perceived (and real) impact on the community would be less.	This comment will be considered during implementation planning.
Center for the Pacific Agency Family	The strategy fails to mention that many of these transitional shelter beds were located in facilities specifically designed to address the safety and supportive service needs of individuals and families fleeing domestic violence. In the County's strategy, bridge housing is positioned as an intervention for those exiting institutions, as well as an intervention for those who need extra support due to substance use or health needs. The County's strategy must recognize that individuals and families fleeing domestic violence are also in need of interim housing, specifically safe and confidential housing which will support a family's transition from a violent home to a safe one. The County must dedicate emergency funding to	This strategy is specifically for individuals exiting institutions. Housing for victims of domestic violence can be addressed through other strategies, as well as through the domestic violence shelter system.

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	replace the reallocated transitional housing funding so that these beds remain open and available to victims of domestic violence	
Family Crisis Center	<p>Interim/Bridge Housing for those Exiting Institutions Initial Draft Strategy Language for which Professional input is Given Below: "There will be an historic opportunity to increase the supply of bridge housing in 2016, when LAHSA will stop funding approximately 2000 transitional shelter beds per direction from the US Dept. of HUD to shift funding away from transitional housing."</p> <p>Comment on Draft Strategy for which Professional Input is Sought: The strategy fails to mention that many of these transitional shelter beds were located in facilities specifically designed to address the safety and supportive service needs of individuals and families fleeing domestic violence. In the County's strategy, bridge housing is positioned as an intervention for those exiting institutions, as well as an intervention for those who need extra support due to substance use or health needs. The County's strategy should not just be limited to those exiting institutions and must recognize that individuals and families fleeing domestic violence and human trafficking and youth are also in need of interim housing, specifically safe and confidential housing which will support the transition to a safe home.</p> <p>Professional Provider Input for Amendment to Draft: The County must dedicate immediate funding to replace the reallocated transitional housing funding so that these beds remain open and available to victims of domestic violence and trafficking and children.</p>	This strategy is specifically for individuals exiting institutions. Housing for victims of domestic violence can be addressed through other strategies, as well as through the domestic violence shelter system.
Hospital Association of Southern California	Strategy identified as a priority can benefit individuals that lack immediate housing upon discharge from an institution (24/7) and who otherwise does not qualify for recuperative care or SSI benefits. Limited capacity and access restrict referrals for homeless individuals that require additional time while board and care or a permanent housing solution is finalized.	Comment noted.
Public	I see nothing in ANY of the planning strategies proposed that will help the homeless adapt to the housing in which they are placed and to keep them safe. The shelters I work with do not even have brooms or vacuums to assist them in cleaning, or guards to help them maintain order. The newly placed homeless can barely afford food, and yet we expect them to pay for cleaning supplies to keep their homes free of dirt and vermin. Once housed, they need a significant amount of in-home support to learn how to live in a healthy manner and to have security help when they need it to manage resident misbehaviors. This planning should be done simultaneously with placing them in a sealed environment where they truly will become invisible...and in more danger in some cases, as with my friend who is handicapped-paralyzed from the waist down and who has been attacked 4 times in a shelter care plus environment. Also, 3 other residents have died there while overdosing in their new, private rooms and who were not found until it was way too late! Plan better!	All strategies which involve subsidized housing will address needed services.
United Way of Greater Los Angeles	Include mention of exploring conversions of previously transitional living facilities (since they are likely more private and attractive bridge housing options). Also, reserve beds for those who are high priority targets in CES to increase flow out of shelter and also increase the ability to quickly find persons	Comment noted.

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	matched to housing.	
Public	I am a volunteer under Bishop Tray. I work with homeless people fresh out of prison. Are you aware of a facility that Garcetti shut down at Sunshine Mission? City barbed that place blocking homeless people out. It can house up to 150 people.	Not aware of this facility being shut down. The authority for such a decision would not rest with the County of Los Angeles.
<b>B8- HOUSING CHOICE VOUCHERS FOR PERMANENT SUPPORTIVE HOUSING</b>		
Hospital Association of Southern California	Strategy directs the Housing Authority of Los Angeles County to incrementally dedicate Housing Choice vouchers for permanent supportive housing for chronically homeless individuals. HASC recommends that vouchers be allocated to the individual CESs who in turn would distribute them to qualifying individuals.	This recommendation will be considered during the implementation planning process.
People Assisting The Homeless	<p>The need for permanent supportive housing for chronically homeless individuals remains huge. As a developer of permanent supportive housing through our development arm, PATH Ventures, we think that funding physical building development is critical to increase housing stock and build fully supportive communities for the most vulnerable individuals living on the streets. However, we know that building takes time, is expensive, and does not address the immediate need to help people secure permanent housing today. The recommendation to direct HACoLA, and encourage other housing authorities throughout the County, to dedicate turnover units to permanent supportive housing for chronically homeless individuals, will help address the permanent housing shortage right away, and on an ongoing, annual basis. We fully support and are thrilled about this strategy.</p> <p>However, we do want to point out what we consider to be a missing element of this strategy – the funding of the SUPPORTIVE component of permanent supportive housing. While strategy B8 creates immediate new units, there needs to be a comprehensive approach to providing the ongoing supportive services for those individuals so that they can retain their housing for the long term. As we all know, simply putting someone into housing is not nearly enough. Housing First as a best practice is fully dependent on providing wrap around supportive services for as long as it takes for an individual to address the range of health, mental health, substance use, and other barriers they might face, as well as develop the skills to manage their money, be a good neighbor, and truly integrate into the community. Otherwise, people are at huge risk of losing their housing and ending up back on the streets. The successful provision of these services will also be critical for retaining landlords who are willing to accept Housing Choice Vouchers.</p> <p>Currently, HACoLA and HACLA have contracts with numerous nonprofit providers to provide those services, but those contracts do not provide any funding for services. PATH currently has such agreements to serve hundreds of tenant based vouchers in the County, which we have always prioritized</p>	Comments and suggestions are noted. Issues identified are to be considered during implementation.

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*Responder	Comment	Response
	<p>for chronically homeless individuals. There is no public funding for the mandatory supportive services we provide for those folks, except for through our contract with the Department of Health Services, which is restricted to frequent utilizers of the County health system and thus leaves out a significant portion of the population, particularly those in regions that do not have any County hospitals or clinics (such as the Gateway Cities, where we work significantly). For all of the other vouchers we manage, the services are privately funded and are thus unsustainable – we are currently unable to accept additional vouchers without services funding, despite the desperate need of our clients to access those housing resources. And we know other agencies are experiencing the same challenges.</p> <p>One other note regarding the expanded usage of Housing Choice Vouchers to provide supportive housing: the successful implementation of this is also dependent on strategy B4 (facilitate utilization of federal housing subsidies). With the housing market the way it is, it is becoming increasingly challenging to find landlords who are willing to accept Housing Choice Vouchers – even for HUD-VASH, which has expanded payment standards to increase the allowable rents. The two components listed in this recommendation (damage mitigation and vacancy payments to hold units) are strategies PATH has already implemented for our own programs, including the 1300+ HUD-VASH vouchers for which we provide services, and have proven extremely successful in recruiting landlord partners. This strategy deserves a great deal of emphasis and funding, as it is critical to the successful implementation of several of the other strategies. Again, though, these financial incentives are only part of the equation – the true key to retaining landlords is providing effective supportive services for the clients housed as well as ongoing customer service for the landlords themselves.</p>	
Public	<p>Screening: it should start with screening. Offices set up to direct homeless people to the services that match their needs. Sign-up for landlords – a website for landlords who are willing to accept the different levels of homeless. Section 8 to transitional, etc. The lists for properties willing to accept the homeless should be provided to each screening office. Medical services should include birth control.</p> <p>Staffing should include people from the homeless community. Illegal apartment units should be turned to Sec. 8 housing. Landlords get income while it provides more affordable housing. Education to community on how to manage their finances to stop a repeat of homelessness. A revenue generating program to continually help fund this program to decrease dependency on government money.</p>	Comments noted.
Public	<p>We need to work with Housing Authorities to give more leniency to disabled individuals before they cancel/revoke their section 8 vouchers. Many mental health clients are becoming homeless due to being evicted from their Section 8 housing and/or the Section 8 voucher expires before they can find a unit that takes the voucher and the HA will not reissue. If an individual has a disability/mental illness, it is difficult to find a section 8 approved home due to MH symptoms, side effects from medications that reduce alertness and focus, or physical barriers if unable to walk around neighborhoods. Many mental health clients who are living on SSI cannot afford rent without Section 8. The rent allowance also needs to be increased so mental health clients can find a place to live in a desirable zip code and not just the lowest</p>	Suggestions will be considered during the implementation planning process.

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
	rent zip codes that may have high crime or substance abuse that the client is trying to avoid for their own health. Sometimes a section 8 unit may be available but the rent is over the rent allowance set by the Housing Authority and therefore the client cannot apply to rent there. There needs to be a better online Section 8 listing that is not outdated by the time the client calls or goes to the unit to see if it is available. We need to help our disabled clients not get evicted from their Section 8 unit too. Landlords can too easily evict our disabled clients	
Public Counsel	Some of our clients with housing choice vouchers (HCV) have experienced difficulty finding owners willing to accept them. Therefore, more incentives are needed to encourage and preserve landlord participation in the HCV program. We applaud the County's recognition that owners need such incentives and support the proposed funding outlined in Strategy B4. However, we are concerned that the County's efforts to prioritize chronically homeless individuals to receive HCVs that become available through routine turnover will not result in successful placements beyond the first two years. This is because the funding incentives identified in Strategy B4 are limited to only two years and the County Plan does not provide any other incentives for owners to accept placements that they may perceive as more challenging given the chronic nature of the individuals receiving the turnover HCVs. Accordingly, we propose that Strategy B4 continue for longer than two years.	The need for these incentives is tied to the current, very tight housing market. If circumstances remain the same in the future, these incentives could be extended, subject to available funding.
<b>C. INCREASE INCOME</b>		
City of Santa Monica	Increase Income: The focus of the Increase Income strategies is on access to benefits, which is a helpful strategy for initially housing and supporting individuals and families who come out homelessness but does not address long-term economic mobility. The current set of strategies is too limited in its approach to alternatives for employment opportunities which pay a living wage. The City suggests a strategy that increases educational, job training, and business partnerships with entities beyond CalWORKs such as AmeriCorps, community colleges, the California Department of Rehabilitation, private and nonprofit training programs, internships, and business partnerships. The City recommends that the plan reflect an intention to reach out to these entities as potential partners.	This recommendation will be addressed during the implementation planning process for the Homeless Initiative strategies.
<b>C1- ENHANCE THE CALWORKS SUBSIDIZED EMPLOYMENT PROGRAM FOR HOMELESS FAMILIES</b>		
Public	CalWORKs is restricted to Welfare to Work families; however, there are some families where the adult is not eligible for CalWORKs themselves, the needs of these families are not met.	Funding from the State for CalWORKs subsidized employment can only be used for families where the parent/relative caregiver participates in the Welfare-to-Work program.

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## County of Los Angeles Homeless Initiative Public Comments

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Public	No mention of GR or GROW? What about the individual who is underemployed but not attached to a DPSS program but are still sleeping in their car?	This strategy is specific to CalWORKs families.
Legal Aid Foundation of Los Angeles	<p><i>Increasing Income</i></p> <p>In a similar vein, the arguments stated above for expanding access to subsidies, hold true for income safety net programs. While specific strategies for increasing income recognize the need to bolster financial security to ensure long term housing stability, the programs contemplated should not be one-size-fits-all. We submit the following suggestions to specific strategy priorities outlined in this section:</p> <p><b>Strategy C1</b> – Enhance the CalWORKs Subsidized Employment Program for Homeless Families – The current period of time a CalWORKs participant can participate in a TSE program is 6 to 8 months. Even for CalWORKs participants who are not homeless and are not faced with the barriers to stability that can impact someone’s success in a TSE job placement, 6 to 8 months is not enough time to gain the skills necessary to find unsubsidized employment. Homeless individuals will need even more time to overcome some of the challenges they will have in getting a stable TSE placement and adjust to a work situation. Employers will also need more time to get the homeless TSE participant into a regular work situation and the participant will need more time to participate in activities to find unsubsidized employment. The time limit on TSE assignments must be expanded to more than the current maximum of 8 months. Also, this strategy does not talk about case management and support services and interim housing these individuals will need to be ready to participate in subsidized employment. This proposal must be revised to include the services required to get the homeless individual ready prior to participation in a TSE placement.</p>	Deferred to Implementation planning- As written, strategy does not specifically address the duration of subsidized employment, and the provision of needed services is included in this strategy.
Neighborhood Legal Services of Los Angeles	<p>NLSLA Strongly Supports the Recommendation to Enhance CalWORKs Subsidized Employment Opportunities for Homeless Families (C1); and the Recommendation to Expand Targeting, Recruitment and Hiring Processes for Homeless Individuals to Increase Access to County Jobs (C2).</p> <p>We support the strategy to enhance the CalWORKs subsidized employment program for homeless families (C1), and the strategy to expand targeting, recruitment and hiring process for homeless individuals to increase access to county jobs (C2). We know that homeless individuals must overcome significant barriers to get and keep a job. For those climbing out of homelessness, it is virtually impossible to do so without a job or other income support.</p> <p>For many of the homeless families we serve, their pathway into homelessness was the loss of a job and resulting loss of income. Through no additional funding, the strategy for enhancing subsidized employment for homeless families on CalWORKs will provide a closer focus on what homeless families need: meaningful connections to the job market through bridge jobs, targeted outreach to diverse employers, employment readiness programs, and coordinated case management. This specialized employment strategy for homeless families is necessary to assess a family’s unique barriers to</p>	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

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	<p>employment, connect them with the needed skills and supports, and uplift them from homelessness. Research has shown that “subsidized employment programs are an effective strategy for boosting employment in the short term for individuals who would otherwise not be employed.” A recent study of TANF subsidized employment programs, including in Los Angeles, found that the long-term unemployed and those with significant barriers to employment benefited the most from such programs. “The most basic lesson is simply that subsidized employment programs can be an effective way to place low-income workers in jobs when the workers cannot find unsubsidized employment. “</p> <p>For homeless single adults, the County also has an opportunity to be a “model employer” and offer access to civil service jobs through a phased entry strategy (C2). The County is the largest employer in Los Angeles, with over 100,000 jobs. Through this strategy, we recommend that the County play an active role in providing employment and invest in people who have or who can attain the job skills for civil service. Through a guided path towards stable employment, candidates can receive relevant training for civil service, placement into positions through WorkSource Centers, and obtain quality supervision and job skills.</p> <p>We recommend an expansion of the CalWORKs’ subsidized employment program, and that the County provide greater access to county jobs for all homeless families and individuals.</p>	
Los Angeles Mission	<p>Employment One key cause of homelessness is lack of income and that must be ultimately driven by earned income not limited government entitlement income. Therefore employment and job training must be linked to and easily accessible for all receiving housing subsidies to the extent recipients are physically and mentally capable of employment. All county homeless assistance should clearly state and expect personal transition to independence. GR and SSI are not sufficient to provide a basic quality of life. See the LA County Focus Group Summary Recommendation 11.</p>	Comment noted.
<b>C2 – INCREASE EMPLOYMENT FOR HOMELESS ADULTS BY SUPPORTING SOCIAL ENTERPRISE</b>		
Downtown Women’s Center	<p>We recommend continued regional advocacy for federally-funded programs such as LA:RISE (administered through the Los Angeles Economic and Workforce Development Department), that specifically address hard-to-reach populations and are designed to meet the job readiness needs of this under-supported population.</p>	Comment noted.
Downtown Women’s Center	<p>We recommend more direct collaboration and alignment between employment and workforce development and homelessness sectors in creating opportunities for high-barrier individuals (including women). We recommend that recognition that employment programs be both about the health and well-being of individuals as well as increased income</p>	Recommendation will be addressed during the implementation planning process.

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## County of Los Angeles Homeless Initiative Public Comments

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Downtown Women's Center	<p>Increase Employment for Homeless Adults by Supporting Social Enterprise</p> <ul style="list-style-type: none"> <li>This is an excellent strategy. Add language around supporting the needs of women within a trauma-informed care setting, and recognizing ancillary benefits of social enterprises for job readiness</li> </ul>	Recommendation will be addressed during the implementation planning process.
Neighborhood Legal Services of Los Angeles County	<p>NLSLA Strongly Supports the Recommendation to Enhance CalWORKs Subsidized Employment Opportunities for Homeless Families (C1); and the Recommendation to Expand Targeting, Recruitment and Hiring Processes for Homeless Individuals to Increase Access to County Jobs (C2).</p> <p>We support the strategy to enhance the CalWORKs subsidized employment program for homeless families (C1), and the strategy to expand targeting, recruitment and hiring process for homeless individuals to increase access to county jobs (C2). We know that homeless individuals must overcome significant barriers to get and keep a job. For those climbing out of homelessness, it is virtually impossible to do so without a job or other income support.</p> <p>For many of the homeless families we serve, their pathway into homelessness was the loss of a job and resulting loss of income. Through no additional funding, the strategy for enhancing subsidized employment for homeless families on CalWORKs will provide a closer focus on what homeless families need: meaningful connections to the job market through bridge jobs, targeted outreach to diverse employers, employment readiness programs, and coordinated case management. This specialized employment strategy for homeless families is necessary to assess a family's unique barriers to employment, connect them with the needed skills and supports, and uplift them from homelessness. Research has shown that "subsidized employment programs are an effective strategy for boosting employment in the short term for individuals who would otherwise not be employed." A recent study of TANF subsidized employment programs, including in Los Angeles, found that the long-term unemployed and those with significant barriers to employment benefited the most from such programs. "The most basic lesson is simply that subsidized employment programs can be an effective way to place low-income workers in jobs when the workers cannot find unsubsidized employment."</p> <p>For homeless single adults, the County also has an opportunity to be a "model employer" and offer access to civil service jobs through a phased entry strategy (C2). The County is the largest employer in Los Angeles, with over 100,000 jobs. Through this strategy, we recommend that the County play an active role in providing employment and invest in people who have or who can attain the job skills for civil service. Through a guided path towards stable employment, candidates can receive relevant training for civil service, placement into positions through WorkSource Centers, and obtain quality supervision and job skills. We recommend an expansion of the CalWORKs' subsidized employment program, and that the County provide greater access to county jobs for all homeless families and individuals.</p>	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

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Public	County should adopt a “local government as a social enterprise” similar to Pasadena’s MASH program. This is more powerful than hiring social enterprises as a County vendor or giving jobs to homeless individuals. The MASH program is a fulltime paid on the job training program with a dedicated job developer. Local government is a very much superior social enterprise than anything like Homeboy Industries or Chrysalis.	This recommendation will be considered during the implementation planning process.
Public	<p>First, thank you for tackling this extremely important social, moral and economic issue. Many politicians have long looked the other way when it comes to homelessness, which is not only inhumane but a waste of human energy, spirit and productivity. Homeless people are generally forced to live in survival mode and are unable to reach their full potential or contribute to society in many valuable ways. While addiction and substance abuse are certainly critical elements in the cause and perpetuation of homelessness, they are not the only causal factors. Job loss/unavailability and health crises that lead to an inability to work in conventional ways, are also major factors driving homelessness. It could really happen to any of us should enough unanticipated events cause our lives to become unmanageable. As a way of supporting the homeless, and empowering them to escape survival mode, I would like to see a program developed that is akin to FDR's WPA but with an environmental and social focus-one that helps the homeless find work or undertakings that are meaningful for them, teach useful skills, and benefit society. *Potential ideas*: a program that creates PAID jobs for those transitioning out of homelessness. These jobs could focus on services and functions that are now largely volunteer-based, like: (1) helping to establish and maintain community gardens; and (2) performing landscaping and vegetation management services using people power (permaculture is a wonderful paradigm for this) rather than heavy machine or chemical techniques. I would also recommend investing more money in Habitat for Humanity projects and promoting project staffers, directors and managers who have been homeless themselves. This creates a visible, inspiring and motivating path out of the cycle of despair and poverty for those who are desperate to escape their situation. Also, the new Tiny House Movement is one that should be explored in crafting new homes for homeless individuals who wish to have greater flexibility and mobility in where they live and/or those who choose to live off the grid for health or philosophical reasons. These are also less expensive to build and much easier to care for over time. This has been quite successful in Nashville (though I would personally recommend that any tiny homes that are built come equipped with showers and kitchens. Many do, though not the ones in the Nashville program). <a href="http://www.theatlantic.com/business/archive/2015/10/tiny-homes-homeless/413212/">http://www.theatlantic.com/business/archive/2015/10/tiny-homes-homeless/413212/</a></p> <p>Finally and perhaps most importantly, invest in programs and people who can help the homeless cope and manage any psychological struggles or mental illness they may be facing so that they can move forward in their lives.</p>	Comment noted. . Some of the recommendations are addressed in other strategies.
Public	One way that many L.A. County non-profit organizations have been able to expand services and community engagement is through the project deployment of national/state service programs such as AmeriCorps, Conservation Corps, Jesuit Volunteer Corps, and other stipend work programs for both	This recommendation will be considered in the implementation planning for Strategy E6 -

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## County of Los Angeles Homeless Initiative Public Comments

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	young and older people, i.e. Senior Corps. I would suggest that the Homeless Initiative explore ways to engage such service programs in the recommended strategies/priorities, particularly in the areas of street outreach and engagement. Such programs could be a key resource for workforce development in being able to engage with more homeless individuals, meeting them where they are, and building rapport/relationships to eventually offer them services. Even if the County could not take on AmeriCorps or other Corps members as direct employees, other partnering non-profit organizations also working on homeless street engagement/outreach may be able to do so, and there is potential for leveraging other County resources to make the case that such workers are needed to tackle the homeless emergency. I would like to see this opportunity explored more in explaining the staffing for outreach/engagement strategies and priorities.	Countywide Outreach System.
Public	Where is the WIA dollars, where are the federal jobs? The jobs offered by Chrysalis are not sustainable employment, homeless need opportunities for good jobs.	Comment noted.
REDF	<p>REDF commends the CEO, staff and the community members who participated in prioritizing social enterprise employment programs.</p> <p>Having a job is one of the most effective ways to prevent homelessness and to stabilize those that are housed.</p> <p>Jobs provided by social enterprises prove to be an effective on-the-job preparation for traditional employment.</p> <p>Working to develop consistent procurement contracting eligibility and practice across jurisdictions for procurement and hiring ordinances will be critical to facilitate access for qualifying social enterprise businesses.</p> <p>We recommend consideration of allocating additional funding for employment retention services.</p> <p>We are eager to help in whatever way we can to move these recommendations forward.</p>	Recommendation will be considered during the implementation planning process.
<b>C3- EXPAND TARGETED RECRUITMENT AND HIRING PROCESS TO HOMELESS/RECENTLY HOMELESS PEOPLE TO INCREASE ACCESS TO COUNTY JOBS</b>		
Public	Civil Service jobs are good for permanent employment. What about having folks who have the experience with homelessness, etc., direct them into jobs that will utilize their life experiences to help others.	Recommendation will be considered during the implementation planning process.
Downtown Women's Center	These are great strategies, and provide much-needed support to help people on benefits.	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
<b>C4- ESTABLISH A COUNTYWIDE SSI ADVOCACY PROGRAM FOR PEOPLE EXPERIENCING HOMELESSNESS OR AT RISK OF HOMELESSNESS</b>		
Downtown Women's Center	These are great strategies, and provide much-needed support to help people on benefits.	Comment noted.
Legal Aid Foundation of Los Angeles	Establish a Countywide SSI Advocacy Program for People Experiencing Homelessness or at Risk of Homelessness – This strategy calls for the full-time colocation of Benefit Specialist Resource teams at DPSS's 14 General Relief offices. There are individuals on CalWORKs in need of SSI advocacy. This strategy should address the needs of CalWORKs participants as well. Also, SSI Advocacy strategies focus on assisting people with SSI applications. However, once an individual is granted SSI based on disability, Social Security routinely and periodically reassesses whether the individual continues to be disabled and SSI benefits are terminated for many homeless individuals who are unable to prove that they continue to be disabled or because Social Security cannot locate them for assistance in reassessing their disability. Some effort should be made for providing advocacy services for individuals in danger of losing their SSI benefits when they are facing a continuing disability review.	This strategy will apply to disabled CalWORKs parents who are homeless or at-risk of homelessness, but does not include other disabled CalWORKs parents who will continue to be served by DPSS CalWORKs SSI advocates.  The recommendation regarding advocacy for formerly homeless individuals at risk of losing their SSI has been incorporated.
Housing Works	Obtaining SSI benefits does NOT result in a person's ability to pay for their housing without a subsidy assist.	Comment noted.
Neighborhood Legal Services of Los Angeles County	NLSLA Strongly Supports Strategies to Establish SSI Advocacy Programs for the Homeless (C4) and for Inmates (C6), but Increased Funding is Needed for the Countywide B.E.S.T. Program.  NLSLA strongly supports the strategies to establish a countywide SSI Advocacy program for people experiencing or at risk of homelessness (C4), and targeted SSI advocacy for Inmates (C6).  In our intake and wellness centers, we often provide legal assistance for people on GR with severe mental and physical impairments who are denied SSI. Many patients cannot obtain medical care consistently and are consequently denied due to a lack of medical documentation supporting their claims. Others are denied because they cannot complete the extensive procedural requirements. These denials do not reflect the severity of patients' health conditions but instead demonstrate the lack of support available throughout the complex SSI application process. For this reason, establishing an SSI Advocacy Program partnering healthcare providers, case managers, legal services, and other key community partners would keep individuals who are homelessness, or on the verge of homelessness, and provide them with the SSI benefits they are entitled to.	Recommendations will be considered during the implementation planning process.

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## County of Los Angeles Homeless Initiative Public Comments

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	<p>A new Countywide SSI Benefits Entitlement Services Team (B.E.S.T.) program should be funded and made a top priority. This strategy could significantly expand the current GR to SSI program, and could reach thousands more people needing assistance. The B.E.S.T. program has proven itself to be highly effective and came with substantial savings to the County.</p> <p>Without an established countywide SSI advocacy program, Los Angeles County will continue to face the high hidden costs of homelessness and use of county and local resources, while otherwise eligible people go without benefits. Before the expansion of the Affordable Care Act (ACA), in Los Angeles County, every \$1 spent on GR also cost \$4.34 for regular users of county health care, mental health, jail, probation, and child abuse and foster care services. While county savings in health care may be less today, other hidden costs for homelessness also include public health concerns and homeless interactions with law enforcement and the court system.</p> <p>The draft proposal is to replace the current GR to SSI advocacy with a new B.E.S.T. model without any new funding. Many chronically homeless people who would qualify for SSI won't be helped if the program is not expanded. The County should expand the number of individuals served by the new B.E.S.T. program by increasing the funding for this proposal. As discussed above, such an approach is cost effective.</p> <p>We also support the strategy to target SSI advocacy for inmates (C6), because SSI and SSDI can help stabilize people released from institutions and prevent them from entering a "revolving door" in and out of homelessness. An estimated 3,400 inmates serving time in Los Angeles jails have severe and chronic health and mental health programs, making them among the most vulnerable and persistently homeless. We have this opportunity to reach these individuals to connect them with preemptive and vital income support that they otherwise would not have as they transition into their communities.</p> <p>Finally, NLSLA believes that successful SSI advocacy programs are inseparably tied to enhancing GR housing subsidies and increasing the use of IAR to reinvest those funds into new housing subsidies (see page 5).</p>	
Public	Homeless patients need massive amounts of advocacy to navigate the system. Important to provide services early and continue with case management and wrap around services in hospitals and clinics.	Comment noted.
Public	Important to partner with health care partners, case managers and legal services. Encouragement to make this a priority program.	Comment noted.
Public	The focus has been on the SSI application process, however recipients are required to re-certify their eligibility from time to time, which some are unable to do. Supporting services for re-certification should be included.	Recommendation incorporated

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## County of Los Angeles Homeless Initiative Public Comments

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Public Counsel	<ul style="list-style-type: none"> <li>We strongly encourage the County to utilize experienced individuals who can demonstrate significant success in obtaining SSI for homeless individuals for whom they filed initial SSI applications. This will reduce the number of applicants for whom an appeal or reconsideration may be required. A competitive process among all interested providers, including government agencies, should be used to identify the appropriate organizations responsible for preparing SSI applications.</li> <li>In addition to assisting people obtain SSI, there must be a focus on helping individuals with any SSI post-entitlement issues. Otherwise, individuals may lose the necessary income to afford their housing and other basic needs. From our experience, these issues range in complexity and often require the assistance of legal advocates. Accordingly, dedicated funding for legal services should be included for such SSI post-entitlement work.</li> <li>Given how essential medical records are to the SSI application process, it is critical that the records retrieval and documentation process not simply be coordinated among DMH, DHS, the Sheriff's Department, and other managed care systems, but there also must be dedicated personnel facilitating this process. DHS' records retrieval project at LAC-USC may provide a model for such a project.</li> <li>CES should be used to identify individuals who are not receiving SSI but who should receive a benefits consultation given other demographics (e.g., VI-SPDAT acuity level of 4 or higher).</li> </ul>	Recommendations will be considered during the implementation planning process.
<b>C5- ESTABLISH A COUNTYWIDE VETERANS BENEFITS ADVOCACY PROGRAM FOR VETERANS EXPERIENCING HOMELESSNESS OR AT RISK OF HOMELESSNESS</b>		
Downtown Women's Center	These are great strategies, and provide much-needed support to help people on benefits.	Comment noted.
Neighborhood Legal Services of Los Angeles County	<p>NLSLA Strongly Supports the Strategy to Establish a Countywide Veterans Benefit Advocacy Program to Reduce Veteran Homeless (C5).</p> <p>As a legal services organization serving veterans in a specialized program, we are supportive of the recommendation to establish a countywide Veterans Benefits Advocacy program to give back to homeless veterans, or those who are at risk of homelessness, who gave so much for their country. Ending veteran homeless must become a priority for Los Angeles County, which has the largest concentration of homeless veterans than anywhere else in the country. According to the latest Homeless Count, in Los Angeles County over 4,343 people who served our country are living on the streets and in shelters.</p> <p>Veteran needs are varied and diverse, and they face significant barriers to receiving care. In a recent USC Center for Innovation and Research study of veterans living in Los Angeles County, 28% and 15% of pre- and post-9/11 veterans, respectively, reported being homeless in the past year; over half of veterans reported that they did not know where to go to get help. Incredibly, the greatest need reported</p>	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

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	<p>by veterans was Veterans Affairs (VA) service assistance (62.5%) and access to health care (55.5%).</p> <p>A coordinated, countywide advocacy program is necessary to provide housing stability, wrap-around case management, and access to healthcare and VA benefits. To tear down barriers veterans face to secure stable housing, the County has an incredible opportunity to create a countywide veteran benefits advocacy team. As recommended in the strategy, VA benefits resource teams will be able to identify and engage hard-to-reach homeless veterans, connect them with needed benefits and supports, and cut through many of the obstacles that homeless veterans face when accessing care.</p>	
Public	<p>Although I recognize the value of trying to obtain SSI benefits for the chronically homeless population in order to recoup General Relief benefits and defray housing and other costs for the population over time, I have concerns about the strong emphasis/reliance on SSI as a source of income in the recommendations, without the caveat/recognition/acknowledgement of the difficulty in obtaining such benefits. First, the "permanently and totally disabled" standard is very difficult to meet, and although some chronically homeless individuals may indeed qualify, it may be more difficult for others to demonstrate they meet the standard through medical/psychological documentation, and further, whether there may not be other alternatives for them to return to the workforce in some capacity. Although SSI is one of the "best" benefits available, it is not nearly enough to cover housing and other basic needs. Further, it is nearly impossible to put forward a successful SSI application without an experienced advocate and/or attorney, and the recommendations do not specify WHO will be providing such advocacy. I fear that the County is failing to take into account the amount of time, persistence, and documentation necessary to put forward a successful application and also taking into account the processing/review time awaiting a response. SSI eligibility is a high threshold to meet and it's unknown how many individuals will actually be good candidates for such benefits. I would also like to see a recommendation for increasing the General Relief payment of \$221/month; this amount has remained the same since the 1970's/1980's and should be increased while the County is implementing other homelessness strategies.</p>	Comment noted.
Public	Encourage this to be a priority strategy.	Though this is not a Phase 1 strategy (given the time that will be required to complete a competitive procurement process), work on this strategy will begin immediately following approval by the Board of Supervisors.
Public Counsel	In implementing the countywide program, contractors must show an extensive history of representing veterans nationally, before various VA Regional Offices, the Board of Veterans' Appeals and the United States Court of Appeals.	This comment will be considered during the implementation planning process.

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<b>C6 - TARGETED SSI ADVOCACY FOR INMATES</b>		
Downtown Women's Center	These are great strategies, and provide much-needed support to help people on benefits.	Comment noted.
Housing Works	SSI Advocacy projects inside or outside jails is good. But, one major obstacle in being awarded SSI if a person struggles with mental illness (and that is a primary diagnosis and criteria for disabling condition & inability to work) is the lack of a well-written, comprehensive mental evaluation ("1002"). This document is almost impossible to obtain from County DMH psychiatrists. That's what we need from the County!	This comment will be addressed during the implementation planning process.
Neighborhood Legal Services of Los Angeles County	<p>NLSLA Strongly Supports Strategies to Establish SSI Advocacy Programs for the Homeless (C4) and for Inmates (C6), but Increased Funding is Needed for the Countywide B.E.S.T. Program.</p> <p>NLSLA strongly supports the strategies to establish a countywide SSI Advocacy program for people experiencing or at risk of homelessness (C4), and targeted SSI advocacy for Inmates (C6).</p> <p>In our intake and wellness centers, we often provide legal assistance for people on GR with severe mental and physical impairments who are denied SSI. Many patients cannot obtain medical care consistently and are consequently denied due to a lack of medical documentation supporting their claims. Others are denied because they cannot complete the extensive procedural requirements. These denials do not reflect the severity of patients' health conditions but instead demonstrate the lack of support available throughout the complex SSI application process. For this reason, establishing an SSI Advocacy Program partnering healthcare providers, case managers, legal services, and other key community partners would keep individuals who are homelessness, or on the verge of homelessness, and provide them with the SSI benefits they are entitled to.</p> <p>A new Countywide SSI Benefits Entitlement Services Team (B.E.S.T.) program should be funded and made a top priority. This strategy could significantly expand the current GR to SSI program, and could reach thousands more people needing assistance. The B.E.S.T. program has proven itself to be highly effective and came with substantial savings to the County.</p> <p>Without an established countywide SSI advocacy program, Los Angeles County will continue to face the high hidden costs of homelessness and use of county and local resources, while otherwise eligible people go without benefits. Before the expansion of the Affordable Care Act (ACA), in Los Angeles County, every \$1 spent on GR also cost \$4.34 for regular users of county health care, mental health, jail, probation, and child abuse and foster care services. While County savings in health care may be less today, other hidden costs for homelessness also include public health concerns and homeless interactions with law enforcement and the court system.</p>	Comments noted.

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
	<p>The draft proposal is to replace the current GR to SSI advocacy with a new B.E.S.T. model without any new funding. Many chronically homeless people who would qualify for SSI won't be helped if the program is not expanded. The County should expand the number of individuals served by the new B.E.S.T. program by increasing the funding for this proposal. As discussed above, such an approach is cost effective.</p> <p>We also support the strategy to target SSI advocacy for inmates (C6), because SSI and SSDI can help stabilize people released from institutions and prevent them from entering a "revolving door" in and out of homelessness. An estimated 3,400 inmates serving time in Los Angeles jails have severe and chronic health and mental health programs, making them among the most vulnerable and persistently homeless. We have this opportunity to reach these individuals to connect them with preemptive and vital income support that they otherwise would not have as they transition into their communities.</p> <p>Finally, NLSLA believes that successful SSI advocacy programs are inseparably tied to enhancing GR housing subsidies and increasing the use of IAR to reinvest those funds into new housing subsidies (see page 5).</p>	
Public	<p>Item #8, 3A. I was surprised to see his item. It was not on the agenda or discussed in any depth in the summit meetings, and therefore did not benefit from the in-depth look and experience of the participants. I disagree with the proposed strategy as it applies to people with mental disabilities, and believe it would have a more harmful impact and delay receipt of benefits, rather than expedite them for the following reasons</p> <ol style="list-style-type: none"> <li>1. SSA disability decisions are based on medical records. Jail medical records, particularly with respect to mental illness, are generally not sufficient to allow an approval decision. As a result, the applicant is sent for a consultative visit, usually lasting 5-10 minutes, which provides a medical record only supporting a denial. The applicant is required to appeal, which can take up to 2 years. If denied by an Administration Law Judge (Hearing), that decision carries over to any new application filed, making it much harder to get approved.</li> <li>2. Once an application is filed, SSA's time pressures to complete processing begins, making it difficult, if not impossible for the applicant to create sufficient treatment history after release to have much impact on the decision. In the case of mental illness, the assumption that filing an application while the person is still incarcerated would increase the probability that benefits would commence shortly after release is incorrect.</li> </ol> <p>The proposed strategy would probably work for persons with physical disabilities. However, the approach I would recommend for persons with mental illness is as follows: The SSI application would</p>	This comment will be considered during the implementation planning process.

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## County of Los Angeles Homeless Initiative Public Comments

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	NOT BE FILED while the person is incarcerated. Potentially eligible inmates would still be identified 3-6 months prior to release, and assessments and gathering of evidence would be initiated. Upon release, the person would immediately be connected to outpatient mental health treatment (POC or DMH clinic). At the earliest point in time when the treatment history supports medical eligibility and a thorough medical report can be done, the application should be filed.	
Public Counsel	This appears only to be available to persons incarcerated for a minimum of three to six months. We recommend structuring this in a manner that makes these service available to short-term inmates as well. Further consideration is required for incarcerated veterans who may be entitled to income from the Department of Veterans Affairs. Identifying incarcerated veterans may also provide needed income to his or her family members. Educating courts and penal institutions about how to efficiently access the VA's VRSS systems will provide aid in identifying incarcerated veterans.	The strategy was revised to include a mechanism to assist those with a shorter jail stay, specifically through a connection to the Countywide SSI Advocacy Program (Strategy C4) upon release.
<b>D. PROVIDE CASE MANAGEMENT AND SERVICES</b>		
Center for the Pacific Agency Family	Create a strategy for the specific case management needs of individuals and families fleeing domestic violence.	This recommendation will be addressed during the implementation planning process.
City of Santa Monica	Provide Case Management and Service The City is concerned with the report's assessment that supportive services for people in housing are an action for which "no funding is required". While the development of Supportive Services Standards may not have direct costs, the ability for programs and agencies to implement such standards will come at a significant cost. The City is concerned that if regional resources remain inadequate to meet needs, existing services will simply continue to be redirected to new priorities, creating new inequities and service gaps. The City encourages the County to be pro-active and aggressive in clearly stating the true costs of these recommendations, as well as identifying funding gaps rather than only stating what funding has been or could be utilized. Furthermore, the shift in HUD policy to only fund housing has left services and transitional programs without a source of revenue creating a new gap in supporting efforts to serve those in need.	There is no cost for developing the standards.
Covenant House California	Case management for youth is complex and addresses very different barriers, trauma, and community opportunities than it does for the adult population. As youth move from the streets to permanent housing solutions, case managers use Positive Youth Development and Motivational Interviewing techniques to build relationships and self-confidence as they make the most of their transitional living time and learn to seize community opportunities.  The County's strategic plan is specific regarding the institutions and environments in which case management should be expanded, and each recommendation is most certainly welcome. As this plan moves into an implementation phase, though, we ask that the County keep in mind the fact that, to be	This comment will be considered during the implementation planning process.

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## County of Los Angeles Homeless Initiative Public Comments

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	<p>truly individualized and effective, case management for youth must be allowed to be non-traditional at times and thoroughly encouraged.</p> <p>Thank you for all of the work that's being done on behalf of people, including youth, who are homeless.</p>	
<b>D1 – MODEL EMPLOYMENT RETENTION SUPPORT PROGRAM</b>		
Downtown Women's Center	<p>Ensure that Workforce Development programs address women's specific job needs. Workforce development and job readiness programs within homeless services have traditionally been geared towards men. If we want to encourage success in ending homelessness for women, we must invest in long-term solutions that serve their job needs. This includes programs that serve older populations re-entering the workforce and programs that recognize and support the ancillary benefits of workforce training (health and wellbeing, community building) in addition to standard metrics such as increased income.</p>	<p>This comment will be considered during the implementation planning process.</p>
Downtown Women's Center	<p>Model Employment Retention Support Program</p> <ul style="list-style-type: none"> <li>• Add technical assistance in best practices supported by SAMHSA, such as Supportive Employment.</li> </ul>	<p>This comment will be considered during the implementation planning process.</p>
Public	<p>Need to increase income.</p> <p>I suggest that the County heavily consider giving employment specialists training to become certified.</p> <p>Correlated to higher retention rate.</p>	<p>This comment will be considered during the implementation planning process.</p>
<b>D2 – EXPAND JAIL IN REACH</b>		
Public	<p>Can you look into and consider the N.A.M.I mental health program in assistance for helping the mentally ill?</p>	<p>Yes, during the implementation planning process.</p>
Public	<p>I want more information on transition when being released from the prison.</p>	<p>Comment noted.</p>
Los Angeles Mission	<p>Engagement of the Non-governmental Services and Support Community</p> <p>Throughout these initiatives the central focus is on county agencies actions. We believe that such actions must intentionally and purposefully be integrated with privately funded partnerships of service providers and funders. We believe the initiatives would be strengthened by a directly stated initiative that these partnerships are valuable and should actively be pursued by all County agencies. Such actions would be particularly helpful to faith-based organizations that may struggle with their involvement.</p>	<p>The County works with community partners and will continue to do so; many community partners assisted with the development of these strategies.</p> <p>The role of community agencies in this specific strategy will be addressed during the implementation planning process.</p>

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## County of Los Angeles Homeless Initiative Public Comments

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Public Counsel	<ul style="list-style-type: none"> <li>• The Sherriff’s Department and DHS should not merely “work with their non-profit partner agencies” to expand Jail In Reach; they should take responsibility for ensuring that every homeless inmate in jail is engaged by a case manager who is able to navigate the individual through the post-release process until full reintegration into society is achieved.</li> <li>• Special attention should be provided to homeless inmates in jail with mental disabilities who will require highly individualized navigation services.</li> <li>• The success of the Jail In Reach program depends on appropriate funding of skilled case managers and of permanent supportive housing and other supportive services. Without appropriate housing and services at the end of a case plan, even strong case management will be meaningless.</li> <li>• Additional metrics are required to measure success of this strategy, including:               <ul style="list-style-type: none"> <li>○ funding for the “single case manager,”</li> <li>○ the size of each case manager’s caseload,</li> <li>○ assessment of case manager performance,</li> <li>○ inventory of services,</li> <li>○ availability of services, and</li> <li>○ waiting time for services.</li> </ul> </li> </ul>	This comment will be considered during the implementation planning process.
<b>D3- SUPPORTIVE SERVICES STANDARDS FOR SUBSIDIZED FOR SUBSIDIZED HOUSING</b>		
Ascencia	This is concerning because none of the agencies tasked with creating these standards directly operate or manage the ongoing services for people living in permanent supportive housing. The process for developing these standards should include site visits to operators of permanent supportive housing and scattered site case management programs. Also, standards should be tiered to reflect funding constraints, and should be tailored to key characteristics of targeted sub-populations.	This comment will be considered during the implementation planning process.
Downtown Women's Center	Supportive Services Standards for Subsidized Housing Add requirement for use of the following Evidenced Based Practices: Housing First, Harm Reduction, Trauma Informed Care, and Critical Time Intervention (a case management model).	This comment will be considered during the implementation planning process.
Public	Only two special populations are mentioned, what about TAY and what about victims of domestic violence?	Suggestion has been incorporated.
Public	I see nothing in ANY of the planning strategies proposed that will help the homeless adapt to the housing in which they are placed and to keep them safe. The shelters I work with do not even have brooms or vacuums to assist them in cleaning, or guards to help them maintain order. The newly placed homeless can barely afford food, and yet we expect them to pay for cleaning supplies to keep their homes free of dirt and vermin. Once housed, they need a significant amount of in-home support to learn how to live in a healthy manner and to have security help when they need it to manage resident misbehaviors. This planning should be done simultaneously with placing them in a sealed environment where they truly will	Comment noted.

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	become invisible...and in more danger in some cases, as with my friend who is handicapped-paralyzed from the waist down and who has been attacked 4 times in a shelter care plus environment. Also, 3 other residents have died there while overdosing in their new, private rooms and who were not found until it was way too late! Plan better!	
<b>D4- REGIONAL INTEGRATED RE-ENTRY NETWORKS – HOMELESS FOCUS</b>		
Ascencia	Please consider SPA sub regions for allocated funding or encouraging program siting. SPA 4 has begun to do this by having CES hubs in Skid Row, Northeast Los Angeles and Silverlake/Westlake.	This comment will be considered during the implementation planning process.
<b>D5- SUPPORT FOR HOMELESS CASE MANAGERS</b>		
Los Angeles Mission	Case management varies greatly across providers. While there is increasing acceptance of best practices there is not sufficient funding in many agencies to provide a robust level of case management that is suggested by the Focus Groups. In addition to technical training, customer service and interpersonal communications skills seems to be inconsistent or not present per the Focus Group comments on staff quality. The county might consider a “seal of approval” or some other incentive to raise the profile of case manager’s professional status as vital to the success of all these efforts. In addition, the county should consider providing funds specifically to fund caseworkers in partnership with private agencies that struggle to add this best practice. Another consideration would be to provide a staff of fully trained traveling case managers, perhaps formerly homeless individuals, employed by the County that would be available to come into agencies and provide that specific functional support on an interim basis. Agencies would likely see the benefits to their clients and be willing to incrementally add this function to their own budgets.	Suggestions will be considered during the implementation planning process.
Ascencia	The most important support a County agency can provide a homeless case manager includes: <ul style="list-style-type: none"> <li>• answering the phone and promptly return phone messages when the call cannot be taken</li> <li>• provide correct information about County programs and resources</li> <li>• when referring to another County department or subcontractor, provide a “warm handoff” to ensure the referral succeeds The biggest challenges we have are getting a prompt response for a person with mental illness in crisis, Adult Protective Services reports, and Department of Children and Family Services reports; and connecting with homeless clients in jail.</li> </ul>	Suggestions will be considered during the implementation planning process.
Downtown Women's Center	Support for Homeless Case Managers <ul style="list-style-type: none"> <li>• Add requirement that County Homeless Case Managers are trained through the United Homeless Healthcare Partners (UHHP) Case Management Institute.</li> </ul>	This suggestion will be considered during the implementation planning process; however, this strategy is focused on support from County

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		departments for community-based homeless case managers, not on County homeless case managers.
Housing Works	“The availability of appropriate case management and supportive services is critical...” (pg. 5) The responding strategy is to “Develop a plan for county departments to support community-based homeless case managers. This support can be done by: 1) helping homeless connect to homeless case managers...” So, county agencies are going to refer their homeless clients to non-profit service providers to get housing and support services. This is not support. We need funding so we can serve county referrals.	Comment noted.
Public Counsel	We are concerned that this strategy may require access to information, individuals, and facilities that may be restricted or unavailable (e.g., LA Sheriff’s Department).	Comment will be considered during the implementation planning process.
<b>D6 – CRIMINAL RECORD CLEARING PROJECT</b>		
Los Angeles County Office of Education	<p>Criminal backgrounds, even minor and long past, are common but serious obstacles for GAIN and GROW. A substantial number of jobs, even at temp agencies, routinely &amp; also illegally screen out such applicants. For some time now I have been assisting students and local community members with their expungements. We had a three-evening expungement clinic at Pomona last year with Univ. of La Verne student volunteers. Most recently, with support from Neighborhood Legal Services, we are planning regular monthly clinics here. Our first webinar training is January 27th, followed by hands-on training February 4th. Clinics begin March/April. We are doing this so far with no additional resources (but I’ll take ‘em if you offer!) and just using volunteers. I do want to candidly comment on Strategy D6 p 58 and 59 since I don’t see how it can be supported by \$200k. Record expungement needs to be available across the board &amp; everywhere to GR, CalWORKs and homeless. Right now there is only one guy that I am aware of in GAIN Region V, focused on expungements.</p> <p>Expungement clinics are few and far between and NLS is stretched thin now to provide supervising attorneys. I myself am not particularly efficient at this since I don’t spend all my time every day doing it like Luis Reyes. There are six PDF forms to fill out for each expungement and two forms for Prop 47 record reclassifications. It’s not rocket science and in fact most of the time involved is talking to &amp; informing people about the process. I sent an email recently to State Judicial Council and hoping for some good news on making forms even easier. For your reference I have included below my contacts at NLS, both of whom are very energized on this issue:</p>	This strategy is focused on training and technical assistance for organizations already involved in assisting homeless job-seekers, not on funding the direct assistance to those job seekers.

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
	<p>Cassandra Goodman Supervising Attorney Shriver Housing Project-LA 111 N. Hill Street, Rm 115 Los Angeles, CA 90012 Direct: (818) 492-5255 Fax: (213) 621-7778 <a href="mailto:CassandraGoodman@nlsla.org">CassandraGoodman@nlsla.org</a></p> <p>Lambreni Waddell Director of Community Engagement Neighborhood Legal Services of Los Angeles County 13327 Van Nuys Blvd. Pacoima, CA 91331 (818) 492-5246 <a href="mailto:LambreniWaddell@nlsla.org">LambreniWaddell@nlsla.org</a></p>	
Los Angeles Mission	We strongly advocate for Homeless Courts to be restored and adequately funded. These have been one of the most successful strategies to address criminal records. We also advocate for some revisions to the 290 problem that has arisen from lumping all offenders into one classification that limits housing.	In addition to strategy D6, the County is continuing to fund the Homeless Court Program. Clinics are held every three months for homeless individuals who need assistance through Homeless Court, as well as supportive services.
Neighborhood Legal Services of Los Angeles County	<p>NLSLA Strongly supports the Recommendation of a Criminal Record Clearing Project (D6), but Recommends Increased Funding to the Project.</p> <p>Criminal records, especially felony records, diminish a person’s ability to earn a viable income. In March of 2015 the Center on Budget and Policy Priorities (CBPP) released a policy brief entitled “Strategies for Full Employment through Reform of the Criminal Justice System.” It showed that a vast majority of large companies conduct criminal background checks as part of their hiring process and over 75% of employers were negatively influenced by a felony conviction or arrest. Those who do make it past the hurdle of finding a job then face a second hurdle—low wages. That same CBPP study found that “having a criminal record can reduce a worker’s annual earnings by up to 40 percent.”</p> <p>In addition, individuals with criminal backgrounds face unique challenges in the public and private housing market in Los Angeles County. Public housing is scarce and many programs have specific</p>	This strategy is focused on training and technical assistance for organizations already involved in assisting homeless job-seekers, not on funding the direct assistance to those job seekers.

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	<p>restrictions that apply to people with criminal records. Having a record limits housing options and increases the likelihood that people with criminal records will have no housing options since “public housing represents a last resort of the returning prisoner to avoid a shelter of the streets.” For example, the Housing Authority of the County of Los Angeles has broad authority to exclude applicants based on their own or another household member’s past involvement with the criminal justice system. In addition, the United States Congress has also passed legislation giving public housing authorities more discretion in prohibiting ex-offenders from living on their properties.</p> <p>The private rental market is also competitive and it is no surprise that landlords and property managers tend to have reservations about renting to individuals with criminal backgrounds. A 2007 study entitled “Landlord Attitudes toward Renting to Released Offenders” found that 66% of surveyed landlords and property managers would not accept an applicant with a criminal history. The law enables property owners to refuse housing to any ex-offender who has any drug-related or violent activity which would adversely affect the health, safety, or right to a peaceful enjoyment of the premises by other residents, the owner, for a reasonable time.”</p> <p>A recent cost-benefit study conducted with participants in the San Jose State University Record Clearance Project in Santa Clara County found that “the average respondent reported an increase in yearly income of \$6,190 after record clearance” and that record clearance increased confidence in 93% of the clients. With the increase in earning potential, people who have been able to clear their criminal records are also more likely to reduce their reliance on government assistance programs.</p> <p>Several other benefits were also cited in the study including: increased gross domestic product, increased tax revenue, reduced recidivism, and several other non-quantifiable benefits such as a preserved family life. With an increase in income and confidence, and a reduction in the reliance on government assistance payments, it is likely that criminal record clearing would also result in stabilizing housing.</p> <p>Expanding the services that are currently available for criminal record clearing and developing a Los Angeles Criminal Record Clearing Project will allow for more people who have a criminal record to receive timely services and be able to move forward in their employment and lives. However, the current funding recommendation for funding in the strategy brief is insufficient as this would be an enormous undertaking for the Public Defenders’ Office. It is necessary also to garner the support of legal service providers and community partners, such as NLSLA, given the fact that at least 700,000 people in Los Angeles County qualify for some type of record clearance assistance. With an allocation of AB109 funds to help expand clinics that take place in the community partners’ agencies, more people could be assisted within their own communities, which could have an immediate impact on both their employment</p>	

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	and housing options. Budget allocation should be increased to allow for the Public Defenders to contract with community and legal service providers that already have long standing criminal record clinics and strong ties to the community.	
Public	Note, expunged does not mean cleared. Many convictions show up in other places.	Comment noted.
Public	Parolees and SB109 need jobs, when they get jobs; they are looking at home ownership not becoming wards of the State.	Comment noted.
<b>E1- ADVOCATE WITH RELEVANT FEDERAL AND STATE AGENCIES TO STREAMLINE APPLICABLE ADMINISTRATIVE ROCESSSES FOR SSI AND VETERANS BENEFITS</b>		
Downtown Women's Center	Advocate with Relevant Fed and State Agencies to Streamline SSI and VA Benefits <ul style="list-style-type: none"> <li>This is one of the most important recommendations. SSI benefits can take nearly two years for approval; homelessness should be a high factor in approval of SSI.</li> </ul>	Comment noted.
<b>E2- DRUG MEDI-CAL ORGANIZED DELIVERY SYSTEM FOR SUBSTANCE USE DISORDER TREATMENT SERVICES</b>		
Public	It's great that we have the opportunity to expand substance abuse services via the DMC-ODS waiver and certainly field-based services would be especially useful with the homeless population. With more people on Medi-Cal, it seems the demand for services will outweigh the supply, if it has not done so already. I hope we are moving toward more streamlined application approaches for agencies who may already be certified to provide Medi-Cal services through DMH who have to go through an entirely separate process with the State to be certified for DMC. Seems there could and needs to be an easier, less timely process put in place, in order for the County to deliver what they want to deliver during the 5 year waiver period and in order for providers to keep up with demand.	Language added to the strategy relative to mental health providers who wish to become certified for DMC-ODS.  Recommendation will be considered during the implementation planning process.
Public	Please support any funding, staffing, establishment of mental health and substance abuse services focused on the homeless. Mental health and substance abuse often must be dealt with before the homeless will access other services such as housing and employment aid.	Comment noted.
Public	Using funds for housing subsidies post-substance abuse treatment for Medi-Cal drug waiver: has this been explored?	Individuals who complete treatment could be eligible for a housing subsidy, depending on their situation, the availability of subsidies, and whether they meet eligibility requirements for certain housing programs. This issue will be addressed during the implementation planning process.

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*Responder	Comment	Response
<b>E3 – CREATING PARTNERSHIPS FOR EFFECTIVE ACCESS AND UTILIZATION OF ACA SERVICES BY PERSONS EXPERIENCING HOMELESSNESS</b>		
Downtown Women's Center	<p>Create Partnerships for Effective Access and Utilization of ACA Services</p> <ul style="list-style-type: none"> <li>• This is one the most important recommendations.</li> <li>• Add recommendation that all CES surveyors have access to applying for Medi-Cal should applicant state they do not have insurance and qualify for Medi-Cal.</li> <li>• Add recommendation that Community Based Organizations implement Evidenced Based Practices for the treatment and management of chronic health conditions most seen in homeless population (i.e., diabetes and chronic heart problems).</li> </ul>	<p>The strategy already envisions the CES surveyors will connect homeless people to the Medi-Cal application process.</p> <p>These recommendations will be addressed during the implementation planning process.</p>
Neighborhood Legal Services of Los Angeles County	<p>NLSLA Strongly Supports Creating Partnerships for Effective Access and Utilization of ACA Services by the Homeless, and Emphasizes the Inclusion of a Robust Health Literacy Education Program into County Efforts.</p> <p>As a signature NLSLA initiative, our Health Consumer Center helps residents of Los Angeles County navigate our county's complex health care system, and ensures people can access the care they need. Accordingly, we address comments to Strategy E3, a recommendation to direct the Health Agency to promote health literacy education through grants to agencies and organizations who are experts in providing education and advocacy assistance to health consumers. NLSLA recommends that a robust health literacy education program be included in the Health Agency's efforts to ensure effective access and utilization of health services by persons experiencing homelessness. The need for an effective health literacy education program is clear when we examine its two components: Medi-Cal enrollment and maintenance, and managed care.</p> <p>a. Medi-Cal Enrollment/Maintenance Literacy Over one million Los Angeles County residents gained Medi-Cal coverage for the first time under the Affordable Care Act. This access to health care provides necessary wellness supports for people recovering from homelessness. But simply gaining coverage and complying with annual recertification requirements are daunting challenges for many homeless individuals. A Health Literacy Education program will educate and empower homeless people to gain and maintain Medi-Cal coverage.</p> <p>One client example highlights the important role of health literacy to help people gain and maintain coverage. Ms. D, a 58-year-old homeless mother, called the Health Consumer Center after she was unable to access urgently needed oncology care. Recently she had transferred from a shelter in Orange County to one in Los Angeles County. When a Medi-Cal beneficiary moves counties, doctors may deny</p>	<p>The specific examples provide support for this strategy.</p>

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	<p>medical treatment because they are unable to bill to Medi-Cal coverage when it lists a different county. In order to keep Medi-Cal coverage when they move, Medi-Cal beneficiaries must inform their county eligibility workers. But Ms. D did not know to inform her worker, and her doctor office did not tell her how to fix her Medi-Cal eligibility issue. A Health Consumer Center advocate educated Ms. D on how to contact her eligibility worker, and within days, she was able to access the treatment she needed. Through the Health Literacy Education program, homeless consumers like Ms. D will learn how to maintain their Medi-Cal eligibility, including when they move.</p> <p>People may apply for Medi-Cal through several channels, including mail, internet, and in-person, but homeless individuals face unique challenges navigating the process. A Medi-Cal application may require copies of documents, which many homeless may not have. In addition, it may require receiving important mail at addresses that homeless individuals may not be able to provide. Fortunately, the county may accept self-attestations in place of many document requirements. And the county's computer system may be able to automatically confirm and retrieve necessary application information. The Health Literacy Education program will educate advocates and applicants on these important rights and many others to ensure they gain Medi-Cal coverage.</p> <p>However, once homeless people gain Medi-Cal coverage, they may lose it unless they know how to comply with the county's annual recertification process. In order to maintain Medi-Cal, beneficiaries must submit detailed household information on an annual basis. Recent state data indicate that nearly twenty percent of Medi-Cal beneficiaries lose coverage each year during the recertification process. Because requests and notices are often sent by mail, homeless people lacking access to regular mail service may face even higher termination rates. By learning the detailed annual recertification requirements through the Health Literacy Education program, homeless individuals and their advocates will know how to prevent gaps in necessary Medi-Cal coverage.</p> <p>Our client, Ms. T, provides an example of the power of Health Literacy Education to prevent gaps in coverage. Ms. T, a homeless mother of four children, had been approved for Medi-Cal, but did not receive Medi-Cal cards. As a result, her 5-year-old daughter was denied care at her primary care physician. Most Medi-Cal beneficiaries, including Ms. T, do not know that a Medi-Cal card is not required to be seen in a doctor's office. Medical staff can look up Medi-Cal eligibility using a beneficiary's social security number, which a Health Consumer Center advocate told Ms. T. When they returned to her daughter's doctor office, staff confirmed Medi-Cal eligibility using her social security number, and her daughter received the care she needed. Also, an advocate worked with Ms. T to request Medi-Cal cards for all household members. Homeless people who attend the Health Literacy Education program will know how to solve these kinds of problems without the intervention of outside advocates.</p>	

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
	<p>b. Managed Care Literacy Over 2.8 million Los Angeles County Medi-Cal recipients receive coverage through managed care plans. Receiving health care through a plan can present daunting challenges: navigating limited provider networks, obtaining prior approval for treatments, filing appeals and grievances, and avoiding costly out-of-network care. Health plan member handbooks, designed to educate consumers on how to access care, often exceed nearly 100 pages. But the care coordination offered by health plans could benefit homeless members. Many Medi-Cal health plans offer “care coordinators” to help members access medically necessary treatments. The Health Literacy Education program presents accessible, concise, and useful information so that members and their advocates can access necessary care.</p> <p>When educated on how to respond to treatment denials and medical bills, Medi-Cal managed care members can overcome barriers and obtain the care they need. The Department of Managed Health Care reports that over half of consumers who file state complaints end up receiving approval for previously denied services. And approximately 20 percent of Medi-Cal beneficiaries struggle to pay medical bills. Members who know how to access “care coordinators” at their plans can access doctors, medications, and services. California law protects Medi-Cal recipients from receiving bills, but many doctors violate the law without patient or advocate intervention. Without education on these rights and resources, homeless individuals may not be able to receive the care they need. The Health Literacy Education program is designed to fill that gap, and empower homeless people to be informed and able to engage in self-advocacy.</p> <p>Our client Mr. S’s story illustrates the importance of Health Literacy Education in helping people navigate managed care. Mr. S depends on regular psychology treatments to manage his mental health conditions. Homeless for several years, he had been seeing the same psychologist who accepted his Medicare and Medi-Cal insurance. But when the state automatically enrolled him into a managed care plan, his psychologist was unable to be paid. Even if they take no action, people with Medi-Cal may be enrolled into managed care plans. Medi-Cal beneficiaries who see doctors who are not part of their managed care networks may be subject to bills and treatment denials. Although his psychologist had not turned him away or sent him a bill, Mr. S was worried that this billing dispute would disrupt his sensitive psychological care. Consumers participating in the Health Literacy Education program will learn how to navigate managed care plans, including what to do if they receive care from out-of-network providers.</p>	
Public	More emphasis needs to be on programs to help the mentally ill. Skilled nursing care which transitions to board and care facilities has had great success in this area. He has spoken to both (nursing care and board and care facilities) who stated they would be very happy to expand the work that they do.	This comment will be considered during the implementation planning process.
Public	Steps need to be taken to ensure everyone eligible applies for Medi-Cal. Suggested that DPSS reach out to the homeless population.	This comment will be addressed through the implementation

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
		planning process.
<b>E4 – FIRST RESPONDERS TRAINING</b>		
Downtown Women’s Center	<p>First Responders Training</p> <ul style="list-style-type: none"> <li>• Include trauma as an area of focus within the training.</li> <li>• Add Community Based Organizations/Housing Providers to “Collaborating Agencies”.</li> </ul>	Trauma informed care was added to the strategy.
LA LGBT Center	I did note the reference to training around transgender individuals for law enforcement. We think that this training should include all LGBT people. I would be more than happy to discuss the strategy further and how LGBT people can be included in the County’s priorities.	The strategy was revised to include this comment.
Public	Please include training on Naloxone, a drug overdose medication.	This will be considered during the implementation planning process.
Public Counsel	While we appreciate the focus on first responder training and that this is a priority strategy, the training must emphasize that issuing tickets for quality of life offenses or arresting individuals experiencing homelessness often destabilizes them and further delays their ability to access housing and jobs. In addition, first responders must discontinue the policy of issuing citations as a way of coercing people into treatment or other programs.	This will be considered during the implementation planning process.
Public	Opportunity to collaborate with first responders (LAPD). Challenge is that officers (who understand the need of the community) don’t stay in that community. Longevity is an issue.	LAPD will be part of the planning for this strategy.
<b>E5- DECRIMINALIZATION POLICY</b>		
Public	The Drug Alliance offers help with decriminalization w/drug policy.	Comment noted.
Ascencia	Homeless Court has been an effective tool for managing the high number of tickets and warrants that many homeless individuals accumulate over the course of life on the streets. I did not see mention of strategies to reduce legal barriers/monetary fines through Homeless Court, which is also an example of excellent partnership between departments. This strategy should be explored further and other cities should be encouraged to implement and expand it.	The County Homeless Court still exists. Although there is some connection to Homeless Court, this strategy is focused on front end engagement between law enforcement and people experiencing homelessness. By contrast, the Homeless Court works with people who already have citations, fines, etc.

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## County of Los Angeles Homeless Initiative Public Comments

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Downtown Women's Center	<p>Decriminalizing Poverty</p> <ul style="list-style-type: none"> <li>• Very important recommendation.</li> <li>• Recommend among detailed performance metrics once policy is implemented: analysis of spend across cities on policing toward homelessness, percentage of arrests/citations of homeless individuals as compared to total arrests within city populations; arrest/citations rates of homeless men versus homeless women.</li> </ul>	This recommendation will be considered during the implementation planning process.
Legal Aid Foundation of Los Angeles	<p>Creating a Coordinated System—Decriminalization Policy</p> <p>We focus our comments here on one specific strategy priority— the commitment to decriminalize homelessness as a policy priority. We applaud the County's leadership in developing a decriminalization policy for use by the County and cities throughout the County. We strongly encourage the Board of Supervisors to ensure that a policy of decriminalization remains in any comprehensive strategy it adopts. In doing so, the County will be in line with federal policy. The Department of Justice recently filed a statement of interest in an Idaho case noting “[t]he United States also has an interest in breaching the cycle of poverty and criminalization. Numerous federal initiatives are tasked with reducing the criminalization of homelessness and promoting alternatives that are more cost-effective, efficient, and fair.” <i>Bell v. City of Boise</i>, 1:09 –cv-540-REB, Statement of Interest of the United States, p. 5. The criminalization of homelessness infringes on the civil rights of people who are homeless. As the draft proposal mentions, there is increased awareness that criminalization harms individuals and communities and undermines efforts to address the root causes of homelessness. The ongoing effects of criminalization make it much harder for a person to move out of homelessness. As Policy Strategy E5 points out, the negative impacts of criminalization strategies are widespread, and have negative consequences for communities that use criminalization as a strategy to address homelessness.</p> <p>The inclusion of decriminalization as part of the County's comprehensive strategy to address homelessness is critically important because the ongoing criminalization of homelessness would undermine the other strategies outlined in the County's recommended strategies. Without eliminating criminalization policies, the effects of criminalization will continue to drain resources from communities, keep people out of housing and in jails, and make it harder for people to secure employment—all vitally important components of the County's Strategies to end homelessness.</p> <p>The County, as a unifying jurisdiction that touches on 88 cities, is in a unique position to serve as a leader in this area, and the inclusion of a decriminalization policy in the Homeless Policy Strategy is an important first step to reducing the effects of criminalization. In particular, the County's support of statewide efforts acknowledges the need for collective action against criminalization, and to stop criminalizing homelessness sends a powerful message that criminalization is not a solution, but rather an obstacle to ending homelessness.</p>	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

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Public Counsel	<ul style="list-style-type: none"> <li>• We strongly support this priority strategy. As a starting point, we direct the County’s attention to the following ordinances for modification: County Municipal Code §§ 17.12.232E (overnight parking in beach public lots); 17.12.232H (placing/storing belongings in public parking areas); 17.12.250 (sleeping on the beach); 17.04.330 (prohibition against staying in park overnight); 17.12.350 (overnight loitering on the beach); 17.04.435 (disturbing the peace at the park); 17.08.210 (sitting/lying in an arboreta/botanic garden).</li> <li>• Similar to Strategy E4, this strategy specifically should include the Los Angeles City Attorney and Los Angeles Police Department, particularly given the absence of a comparable strategy in the City of Los Angeles’ plan addressing homelessness. Throughout the years of administering the County’s Homeless Court program, we encountered numerous individuals with citations for minor quality of life offenses, such as jaywalking or fare evasion. Often the same individual had similar citations from both the City of Los Angeles and another County jurisdiction. Encouraging the City of Los Angeles to participate is critical to realizing the various housing, employment and self-sufficiency goals of the County Plan.</li> </ul>	This comment will be considered during the implementation planning process.
<b>E6- COUNTYWIDE OUTREACH SYSTEM</b>		
Public	Countywide Outreach System <ul style="list-style-type: none"> <li>• Add requirement for common training curriculum that includes best practice model of Trauma Informed Care.</li> </ul>	This comment will be considered during the implementation planning process.
Public	At the January 20, 2016 Second Supervisorial District Community Meeting, Supervisor Mark Ridley-Thomas discussed the typical profile of homeless persons in the Second Supervisorial District as ‘single, African American, adult, and male.’ The new system strategies should take care not to discriminate against the typical homeless profile of single adult males and females, while emphasizing service to families and youth. In street-level outreach projects I have observed the unintended consequence of homeless single men seeking homeless single women with children in order to access services (denied to single adult men) – forming “instant family” may create tension between the mother and children and desperation in the man. Reorientation of strategies and realigning resources may be needed. Thank you for your service and good luck. I believe County of Los Angeles Homeless Initiative is one of the most important ventures of the decade to reclaim the moral character of Los Angeles County.	This comment will be considered during the implementation planning process.
Downtown Women’s Center	Require that Trauma-Informed Care be implemented across all service provision. Among the service models critical to ensuring long-term success in ending homelessness for all individuals is Trauma-Informed Care (TIC). This best practice recognizes the traumatic impact of homelessness on an individual’s physical and mental health, and hinges on asking, “What happened to you?” rather than, “What is wrong with you?” Given the level of training and outreach outlined in both the City and County plans, it is crucial that TIC be applied at all levels of service provision. When	This recommendation will be considered during the implementation planning process.

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## County of Los Angeles Homeless Initiative Public Comments

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	<p>implemented throughout service delivery, TIC leads to more long-term health and housing outcomes for survivors of trauma (Shelter from the Storm: Trauma-Informed Care in Homelessness Services Settings, 2010). In particular when ending homelessness for women, we need a service delivery system that recognizes and is sensitive to the prevalence of past and ongoing trauma in individuals' lives.</p> <ul style="list-style-type: none"> <li>• We recommend that TIC be made a grant requirement for homeless service providers funded through City, County, and LAHSA. We believe utilization of the model would ensure the strongest outcomes and the greatest likelihood of ending the cycle of homelessness not just for women, but for all homeless individuals.</li> <li>• We recommend that TIC be integrated into all the outreach and engagement strategies, and training opportunities e.g. CES case managers, "C-3" Teams, LAPD.</li> </ul>	
Downtown Women's Center	<p>Countywide Outreach System</p> <ul style="list-style-type: none"> <li>• Add requirement for common training curriculum that includes best practice model of Trauma Informed Care.</li> </ul>	This recommendation will be considered during the implementation planning process.
Nate Shaw, Mental Health Advocate	<p>I am wanting to know of your awareness of SB-82's involvement in outreaching the epidemic of homelessness here in our city? The Community Meeting held on January 13th was impressive with the sharing and feedback from those of us in the community. And it is good to know the growth or hopefully the regression of homeless numbers and other statistics that go along with such. Breaking ground from my stand point as a peer advocate with lived experience is important for me in being able to get out there and get my feet wet in the process of establishing relationships that get results – homeless free. From experience 'giving up' is not an easy barrier to get through from any standpoint and the up and coming recognition of peer level empathy may be a very valuable asset to add in outreaching. I've experienced programs and put my own self in a mode to accept the challenge of overcoming homelessness, addiction and the like and fought my way through more than we have in helping to get what I have today. One program in particular back home allowed not just "housing first" but the achievement and stability of responsibilities so I could maintain a roof over my head. Wonder how many fail at this level? Brainstorming need inclusion in the helping process I believe we have undertaken in this crisis of homelessness, addiction, mental health issues and the like. More is needed as was spoken many times in the King parade yesterday. Are all eight areas up and running with SB-82 teams? I have visited three regions (1,2 and 4) who are doing outreach. I know it is a long process and time will make its progression work. I wonder about areas such as region six as I myself know of a past co-worker of an outpatient treatment center who lives in his van and shut down now for over six years. There are RVs and vans along with cars that are lived out of all along a certain part of south Vermont Avenue. Hopefully more involvement will start up soon. I will stay in touch with all those over this project of helping. I continue to get as much training as offered in an effort to be fresh and ready for the tactics needed in fighting this homeless battle.</p>	SB 82 will be addressed during the implementation planning process.

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## County of Los Angeles Homeless Initiative Public Comments

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Public	<p>As part of the "Street Outreach Efforts" there should be specific attention paid to the plight of homeless while they remain homeless. Many of the programs listed in the recommendations could take months if not years to implement, and do not address the direct needs of the homeless today.</p> <p>According to the "National Coalition for the Homeless" report published in October 22 2014[1] Los Angeles is part of a growing group of cities attempting to criminalize feeding the homeless. This seems completely counter intuitive to the statements being made by the Homeless Initiative. In fact there is little in the Homeless Initiative in the way of immediate assistance, and as most volunteers are aware homeless are wary of city and/or private services that require them to register, or follow conditions, as they blame the very system trying to help them.</p> <p>A true initiative would consider that we need to gain the trust of the homeless, and there is no better way to their hearts than through their bellies. We need direct food assistance, in the form of mobile food services such as a food truck. A soup kitchen on wheels, where homeless can be provided a hot meal at their tents, with no conditions attached, where they will be more amenable to talking to service providers on available options to alleviate the homeless condition on a more permanent basis.</p> <p>In addition the mobile soup kitchen (food truck) can have added stores of long term rations (i.e., discarded military, or surplus) and some small amount of jackets and or toiletries which could help them stay warm and healthy until the more aggressive and long term services the city is working on can be brought to fruition. This is The Bakhtiar Foundation's primary objective. To raise enough funds to permit and operate a food truck that feeds the homeless, and in doing so identify and connect the most desperate with services (such as those with children). Nothing speaks to people like a warm cup of soup on a cold LA night, and there are few things like a warm meal to get them engaged. I truly appreciate the city taking the time to develop a robust set of services which can help alleviate the homelessness epidemic in Los Angeles, but let's make sure we are addressing the immediate needs as well, not just looking at the long-term issue and strategizing while thousands of people suffer from hunger in the city.</p> <p>[1] <a href="http://nationalhomeless.org/wp-content/uploads/2014/10/Food-Sharing2014.pdf">http://nationalhomeless.org/wp-content/uploads/2014/10/Food-Sharing2014.pdf</a></p>	<p>Strategy E6 is designed to engage homeless persons on the street and in encampments, and to connect them to services and housing.</p>
Public	<p>Countywide outreach is already done through LAHSA, why an additional \$3 million allocated to this effort?</p>	<p>More resources are required for outreach.</p>
Public	<p>I will like to recommend to implement more homeless drop in center shelters countywide and more affordable building for families, adults, seniors and young adults.</p>	<p>The initiative/strategies address both shelter and affordable housing.</p>
Public	<p>Outreach to single older homeless adults, who have not been addressed in the recommended strategies</p>	<p>Older adults are listed as a target population.</p>

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## County of Los Angeles Homeless Initiative Public Comments

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Public	Suggested SB 82 and more outreach to older adults.	SB 82 will be included in the implementation planning process; older adults were added to the target population.
Public	We need more outreach and engagement to alleviate the trust issues the homeless have, we need to engage them and not categorize them.	Comment noted.
Public	I am a pastor with homeless ministry. We are focusing on unsheltered homeless adults. We try to engage the homeless, but most of them don't want to take advantage of services. We need trained people who can truly engage the homeless one by one.	Comment noted.
Korean Churches for Community Development	I am the Executive Director for Korean Churches for Community Development in Korean Town. Korean churches have homeless ministries, but they are not connected with broader community. Need to create better linkages. Also had a homeless forum with the pastors. LAPD identified a homeless liaison. Also have an active list serve. Recently had an inquiry to help an homeless individual. Assistance poured in (\$, housing, employment opportunities) Human trafficking is a significant issue. Asians are the second highest affected. There are opportunities and challenges. KCCD is also a training site.	Comment noted.
United Way of Greater LA	Mention that existing coordinated outreach meetings and case conferencing at each CES hub should be taken advantage of. Under funding, list possible connections with the Home For Good Funders Collaborative to leverage additional private matching contributions.	Comments will be considered during the implementation planning process.
<b>E7- STRENGTHEN THE COORDINATED ENTRY SYSTEM</b>		
City of Santa Monica	Create a Coordinated System  The City applauds the inclusion of a coordinated Federal advocacy effort in the strategies for this topic. The City suggests that County-wide partners collaboratively advocate with HUD for higher payment standards and to address other policies that impact the ability to house people who are homeless or retain housing for people at risk of homelessness. In particular, Los Angeles County is experiencing unprecedented rent cost increases and vacancy rate decreases. Combined, these market changes make it virtually impossible for voucher holders to find units within the payment standards. A recent study of the Santa Monica Housing Authority new voucher holders and porting voucher holders found that during a 24 month period from 2013 to 2015, less than one percent of voucher holders found apartments in the general rental market and that only four percent of available market rate units rented for amounts within SMHA's payment standards. Instead, limited deed restricted housing (which is heavily subsidized by the	Comment noted. Cities will be intentionally included and encouraged to participate in all future Homeless Initiative activities, including implementation planning, implementation, and advocacy.

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## County of Los Angeles Homeless Initiative Public Comments

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	<p>City) is filling the affordability rental gap. As a result, less people and consequently fewer voucher holders can find housing. If HUD rental subsidies were competitive in the Los Angeles County marketplace the success rate of finding housing would be greater. Additionally, deed restricted housing has been funded through the city affordable housing programs and the city is heavily subsidizing the construction and rehabilitation of them.</p> <p>Additionally, the City strongly recommends that local jurisdictions be more intentionally included as members of the Advisory Council, Implementation Coordination, Federal and State advocacy efforts and in specific strategy workgroups.</p>	
Ascencia	<p>This is an area where Ascencia is very well-versed. Owing to the way in which CES has been implemented, Ascencia, an agency with 17 full-time employees, is part of three Coordinated Entry Systems. We are the lead for the Glendale Continuum of Care, we have a co-located housing navigator from LA Family Housing and are part of the SPA 2 CES, and we are part of the SPA 4 NELA CES. In the first five months of implementation, we spent 244 hours of staff time in meetings to coordinate efforts.</p> <p>General Concerns</p> <ol style="list-style-type: none"> <li>1. Reliance on SPA boundaries. This is outdated, and does not reflect the way in which homeless services have evolved in the City and County of Los Angeles. By not taking into consideration a long-standing Access Center in Glendale as the potential central point for the area from Burbank to the 110 Freeway, the CES system has promoted fragmentation and competition, and for us, extraordinary inefficiency and duplication of effort.</li> <li>2. The boundaries are meant to be administratively convenient but do not promote localized response for homeless people. SPA 2 is enormous – (2 million people, nearly 1,000 square miles). To centralize services to that degree is very hard for clients. It also makes it difficult to engage local communities because the geography covered is so broad. SPA 4 NELA (Northeast LA) is a good example of how a more localized approach can work. By forcing a lead/subcontractor relationship among nonprofit agencies, the funders have imposed a layer of bureaucracy on the nonprofit sector.</li> <li>3. The “one per SPA” rule funding is a way to manage a funding pool that is simply not enough to generate results on a scale that would be evident to the public. The system gravitates to the larger providers, with even less funding percolating down to the subsidiary agencies in the system. The recommendations rightly seek to mitigate this, but it does not address the fundamental problem of using SPA boundaries.</li> <li>4. Before investing more resources in the administration of CES, the County should ensure that the housing placement flow is what it needs to be. The entire section on CES offers ways to dig deeper (and adding to costs) by implementing a system that is inherently limited because there is not enough housing to move people off the streets. Due to a shortage of affordable housing units (noted in 4.8) providers are facing significant delays in housing placement, which is also backing up this system.</li> </ol>	All comments will be considered during the implementation planning process.

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	<p>5. The system needs to have staff dedicated to cultivating and continuing relationships with private landlords and property management companies. This has been referenced in the strategy but bears emphasis. This is a different skill set than the Housing Navigators that have been part of the original CES rollout.</p> <p>6. Core training for housing locators should include Fair Housing information.</p>	
Center for the Pacific Agency Family	<p>The goals of improved data tracking, data sharing, HMIS integration, and broader use of HMIS across agencies under CES should be treated differently when it comes to domestic violence victims. Unlike other homeless subpopulations, the need to protect victim safety and confidentiality trumps all other concerns related to system integration and efficiency.</p> <p>Recommendation: The stated goals under this strategy need to be adjusted to account for the special safety, confidentiality and service needs of domestic violence victims. The CES “plan” assumes that all populations should access CES in the same way, are entered into HMIS in the same way, can be case managed and matched to housing through CES in the same way, etc. The plan needs to ensure that domestic violence victims have equal access to housing resources through CES/HFSS. However, the plan needs to recognize that the domestic violence system is an established system that is designed to meet the special needs of this high risk population. The goal, therefore, should be to identify and lay out strategies to better LINK the two systems so that domestic violence survivors can access housing resources, including housing location assistance and rental assistance.</p>	Language added to the strategy description based on this comment, and the various aspects of this comment will be addressed during the implementation planning process.
Children’s Hospital Los Angeles	DMH – there is no mention of the Department of Mental Health in Strategy E – Create a Coordinated System. Due to the large number of youth and adults experiencing homelessness with mental health disorders, it seems like DMH needs to be specifically called out as a partner.	DMH is listed as a Collaborating Department/Agency.
Downtown Women’s Center	<p>Strengthen the CES</p> <ul style="list-style-type: none"> <li>• Add requirement for all HUD funded housing providers to move turn-over units into the CES.</li> <li>• Add incentives for non-HUD funding housing providers to add units into CES (incentives could mirror those in B4.</li> <li>• Add data analysis to ensure parity of housing placement across subpopulations including women, families, and veterans.</li> </ul>	This comment will be addressed during the implementation planning process.

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Downtown Women's Center	<ul style="list-style-type: none"> <li>• We recommend that LAHSA track housing assignments by gender in the Coordinated Entry System (CES), to see if women are accessing housing at a proportionate pace to men. The Downtown Women's Center is a CES entry point for SPA 4. In 2015, we entered 150 women into CES and 27 were matched to housing (18%). Since the start of CES in 2013, we have entered 599 women and 62 have been matched to housing (10%)</li> <li>• We recommend that the housing available through CES be expanded to include more permanent supportive housing and low-income units set aside specifically for women.</li> <li>• We recommend that the City, County, and LAHSA add to their criteria for funding decisions the need to demonstrate how applicants are effectively addressing the unique needs of unaccompanied women experiencing homeless.</li> </ul>	This comment will be addressed during the implementation planning process.
Family Crisis Center	<p>Strategy: Strengthen the Coordinated Entry System and E12: Enhanced Data Tracking and Sharing            Comment on Draft Strategy for which Professional Input is Sought: The goals of improved data tracking, data sharing, HMIS integration, and broader use of HMIS across agencies under CES should be treated differently when it comes to domestic violence victims, human trafficking victims and children. Unlike other homeless subpopulations, the need to protect victim and child safety and confidentiality trumps all other concerns related to system integration and efficiency.</p> <p>Professional Provider Input for Amendment to Draft: The stated goals under this strategy need to be adjusted to account for the special safety, confidentiality and service needs of domestic violence, human trafficking victims, and children. The CES "plan" treats all populations the same in regards to access, HMIS, case management and matching of housing, etc. The plan needs to ensure that domestic violence, human trafficking victims and children have equal access to housing resources through CES/HFSS. Confidential information about human trafficking victims and domestic violence victims cannot be shared to the degree and with the methods that the initial plan envisions, either by law, or by safe, logical, sound best practices.</p> <p>The plan must also recognize that the domestic violence system is an established system that is designed to meet the special needs of this high risk population. The goal, therefore, should be to identify and lay out strategies so that domestic violence survivors can access housing resources, including housing location assistance and rental assistance.</p> <p>Some additional strategies might include (we can elaborate on these and provide a fuller plan...):</p> <ul style="list-style-type: none"> <li>- Co-location of (minimally) 40-hour certified (per Evidence Code 1037-1037.8), Domestic Violence Advocates at each CES hub. Just as HFSS hubs currently co-locate DPSS Eligibility Workers, DMH personnel, and DPH substance abuse counselors are co-located at each HFSS site, DV Advocate/Counselors should also be co-located.</li> <li>- Ensure that assessment tools include appropriate questions to address exposure to domestic</li> </ul>	Language was added to the strategy description based on this comment, and the various aspects of this comment will be addressed during the implementation planning process.

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	<p>violence and human trafficking. Because the safety and service needs of victims and their families are different than those utilizing standardized CES assessments, allow local victim service providers to complete standardized CES assessments and other paperwork/applications/etc., rather than requiring that CES staff first complete this documentation, as part of the referral and services access process.</p>	
Los Angeles Mission	<p><b>Coordinated Entry Expansion and Service Delivery</b> As an early proponent of the CES concept we envisioned it to no be limited to a singular focus on housing but as a coordinated system of client choice service provision from emergency shelter options all the way through to permanent housing at the point the client felt there were ready for housing. By adopting a Housing First mentality to the CES we believe clients who would choose residential care programs and transitional housing have been unfairly discriminated against on the basis of a singular solution to life's problems. Transitional housing serves a very beneficial role in the lives of many clients. Using a medical analogy there are times when home is not the right medical choice and an interim step is needed to address specific challenges or to provide care levels that are not achievable on outpatient basis. Homelessness is not simply the lack of housing but a lack of sustainable housing we must address all relationship challenges that result in unsustainable shelter or returns to homelessness. And those relationships are varied. Who better to understand their needs than the client based on success or failure with other housing and service options? Therefore, we advocate for a full range of housing and service delivery types to be integrated fully into CES without penalty to the client who chooses transitional housing options over housing first outpatient service models.</p>	This comment will be considered during the implementation planning process.
Little Tokyo Service Center	<p>Also the reality of CES and the assessment tools are not functioning as indicated in the draft reports. The process to match candidates with housing opportunities is labored and excessively protracted with various agencies and providers having different understanding of the process, leading to mismatches and delay.</p>	This comment will be considered during the implementation planning process.
Neighborhood Legal Services of Los Angeles County	<p>NLSLA Strongly Supports Strengthening the Coordinated Entry System (E7), and Enhancing the Emergency Shelter System (E8), but Believes the Draft Should Address the Needs of Vulnerable Populations. <b>Strengthening Coordinated Reentry (E7) and Enhancing Emergency Shelter (E8)</b> Strategy E7 &amp; E8 call for an "increased emphasis on collaboration, sharing of best practices, and funding toward homeless assistance" to more effectively tap into underutilized yet available resources to help a broader group of individuals. NLSLA strongly supports the plans to leverage and expand existing programs.</p>	Comment noted.
Public	<p>Do not strengthen the Coordinated Entry System, it does not work. Speaker cited the increase in the homeless population over the last few years, years which the CES was in place.</p>	Comment noted.
Public	<p>I am concerned that the strategies do not prioritize people living with HIV/AIDS into housing. Stable housing is the most effective health intervention for persons with HIV that results in lower viral load, which means they are less likely to transmit HIV (Medical care over life time \$365,000). The LA</p>	This comment will be considered during the implementation planning process.

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*Responder	Comment	Response
	Coordinated Entry System uses the VI-SPOAT to assess individuals. Unfortunately, this too provides the same score to HIV as it does frostbite. To create an HIV-free generation, we need robust housing options for this population	
Public	I called the emergency year round shelter hotline (800)548-6047. I spoke with Raquel to get options for Nancy who is homeless and in need of shelter tonight. Union Rescue Mission Midnight Mission Raquel doesn't know if there are any openings you have to go physically visit each site to determine if there are openings. The shelters are first come and first serve. She can only send me 2 options per call because of the high volume. I was on hold for 10 minutes before I was able to speak with anyone. Raquel asked me to call back again if I wanted to get any more options or information for Nancy. Is the emergency hotline helpful? The "help" they provide, is really no help at all in my opinion. Why can't LA County consider have information re/ beds available on-line so homeless people can secure a place without having to travel all over LA County when they don't even have a car? Why can't homeless individuals be given help instead of a 2 option limit then call back option? The quality of the service provided on this hotline call was horrible. LA County needs to provide help, not just a 2 option limit and bye-bye! Thanks for your attention to and help in this matter.	This comment will be addressed during the implementation planning discussions for Strategy E8 – Enhance the Emergency Shelter System.
Public	In 2009 the Housing Authority had an event call Housing Expo where 400 homeless applicants and their providers were sent to the Swim Stadium at Exposition Park after their criminal history cleared. At this event recipients were interviewed, processed and given a voucher in one day. My recommendation would be to have an event specific to the Housing Expo but use the CES to match 400 plus homeless individuals and or families in one day.	Comment noted. Will be discussed during the implementation planning process.
Public	Incorporate Public Libraries - they are being used as temporary shelter during the hours they are open, libraries are community hubs, outreach could be very effective there.	This comment will be considered during the implementation planning process.
Public	Support of the CES, additional funding should be identified.	Comment noted.
Public	LACHAC is concerned that the strategies do not prioritize people with HIV into housing. HUD has linked stable housing to fewer transmissions of HIV and lower community viral load. As a public health issue, it is integral that the County prioritize people with HIV in the CES by granting them automatic high acuity scoring in the UI-SPDAT to reduce transmissions and healthcare expenditures	This comment will be considered during the implementation planning process.
Public	Will there be an opportunity to develop housing for minor youth (15-17) to help runaway /throwaway youth with having safe housing and the supportive services to aid in their personal and emotional well-being? There is a need to expand this in the 2nd district as it is being done in other major cities to help these youth graduate high school, secure employment , or reunify with their families.	Comment noted; this comment will be partially addressed through Strategy E14 - Enhanced Services for Transition Age Youth.
Topanga Town Council	In Topanga, we have a concern with homeless encampments that directly affect Topanga's creeks, parks and State Beach. We are concerned for the safety and health of our homeless residents and of its ramifications for the general community at large; including the wildlife and environment. Potential fire is one of the highest concerns as our homeless individuals need to keep warm during the winter months	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

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	<p>and cook throughout the year</p> <p>The Town Council has a homeless reach-out program but is limited by lack of funding. We work with the Supervisor's Office, the Sheriff's Department and local volunteers.</p> <p>Anything you can do to help assist the homeless community is welcomed and is appreciated by the 10,000 people living in the Topanga community.</p>	
United Way of Greater LA	<p>I pushed for us to pick off a few things for group consensus to quickly advance the discussion, but I think the eligible items that qualify for this funding designation should be broader. In addition to what you've already listed, additional items that are key to strengthening CES (and mirroring the City strategies) include: additional regional and service coordinators in each SPA + case managers (navigators + retention specialists that are not attached to any specific subsidy but could help transform all those HACoLA turnover vouchers + affordable/shared housing into PSH). Also, this is cost-neutral, but it should be recommended that the CES platform consolidate the family, youth, single adult, and DV resources and clients.</p>	<p>This comment will be considered during the implementation planning process.</p>
Public	<p>AGENCIES VOUCHING FOR PLACING HOMELESS INTO HOUSING MUST BE HELD ACCOUNTABLE TO PLACING HOMELESS INTO MAINSTREAM HOUSING AND AGENCIES MONITORED MORE CLOSELY FOR THEIR SCREENING PROCESS. WHY? Some homeless have severe mental health issues, esp. schizophrenia, paranoia, multiple personalities disorders. Although they appear to be independent, THEY REQUIRE ON-GOING SUPERVISION as they will become a danger to self &amp; others. I AM CURRENTLY A PARTY TO LEGAL RESTITUTION re a schizophrenic renter who slashed my car tire &amp; other tenants in the gated parking area. He threatened a tenant with breaking her nose (he slashed five of her tires in two months); "talks" to invisible people, drinks alcohol which contraindicates any medication he may be taking, puffing on marijuana &amp; we suspect meth. Such a person needs housing in a facility better suited for his/her dangerous mental health needs -- and NOT mainstreamed with seniors (I and several tenants are seniors, some using canes, walkers &amp; wheelchairs); infant &amp; children visitors. NOTE: Since County/City of LA decided to house homeless -- my senior only apt complex is awash with tenants under 55+ -- the youngest tenant here is under 30. I have NO issue with housing homeless -- this is a long-overdue social &amp; moral issue. But I DO have an issue if placement is made on numbers placement &amp; not on homeless person's TRUE needs. The multiple-personality tenant in my complex rules the hallways -- running down hallways at all hours, knocking on doors to be let in, has a therapy dog which appears to a puncture wound (like a sharp instrument cut) on it's right rump. Many homeless tenants have "street family" who jump over the walls to enter the complex. Security locks are jimmed or left open by the tenant letting street family in. During the night, some "street family" are run along the hallways to sleep on the stairways or hallways. This means the tenant IS NOT taking the lease &amp; house rules seriously -- AND KNOWS that Property Management is ham-strung to evict them. So we -- the non-Section 8 tenants -- are made to suffer the nuisance. I DO</p>	<p>Comment noted.</p>

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	NOT enter the hallways or elevators unless I know who the person(s) are occupying the same. My personal safety is my immediate concern. Is this the way for a senior to live? Submitting to you for your serious consideration & application.	
<b>E8- ENHANCE THE EMERGENCY SHELTER SYSTEM</b>		
Public	The city of Santa Monica created in 1988 SHAWAHLOCK (Showers Washers Lockers) which allows a homeless person to come to the facility take a shower wash their clothes and keep their stuff to be able to go seek work. the testimonies of users of the facility called SWAHSHLOCK the ' Place of Honor and Human Regard '. If every city and community in our county would create this opportunity it will change the landscape of homelessness as we know it. Chrysalis a service for employment is active with the Chamber of Commerce and employers in the community and has preparatory lessons and activity preparing the person for jobs and connects the person to opportunity and survival. Some housing is provided at SAMO SHELL in the City this was created by the homeless committee of the Chamber of Commerce; it houses about 100 people man /women a night , and prepares them for housing jobs and health care. The many facilities in Santa Monica for the homeless and the continued connective activity with the others in the community, merchants and housing providers provides a livable place for all. I will be happy to participate in any discussion activity etc. on this issue.	This comment will be considered during the implementation planning process.
Public	Enhance Emergency Shelter System <ul style="list-style-type: none"> <li>• Add County advocacy efforts to combat NIMBYism for shelters that need to move from night programs to 24-hour programs.</li> <li>• Encourage shelters to sub-contract with community based providers making referrals into shelter beds for more coordinated case management efforts. (e.g., a shelter contracts with a COB that makes referrals, guaranteeing x amount of beds if the referring agency conducts the case management). Prevents duplication of case management and preserves the relationship formed by the original case manager and client.</li> </ul>	Comment noted.
Ascencia	Please engage as many operators of existing emergency housing in this strategy as possible before implementing this change. Although Ascencia is in the Glendale Continuum of Care, we also provide year-round shelter to families referred through the SPA 2 Family Solutions Center. And over half our 1200 clients each year come from outside the City of Glendale. As noted in the CES comments above, we have struggled to replace lost funding due to shifting priorities, yet we know that there is a continuing need for these beds. <ol style="list-style-type: none"> <li>1. 24/7 operations: Our year-round program is 40 beds. We would love to have the funding to stay open for our residents who have critical health needs. We currently budget for this on an ad hoc basis (for clients with newborns, following surgery or chemotherapy). However, it should be noted that having a requirement for clients to go out during the day an also be therapeutic and so daytime shelter hours should not be considered an entitlement. In some cases, if we did not have a rule about leaving for</li> </ol>	This comment will be considered during the implementation planning process.

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	<p>the day, some of our clients would never leave the shelter.</p> <ol style="list-style-type: none"> <li>2. System transformation: Our emergency shelter is fully integrated with our Access Center, which has four case managers, each with a different specialization (mental health, substance abuse recovery, employment, entitlements), in addition to housing search assistance. We would appreciate having an assessment to explain what it is we need to do to conform to the bridge housing standard. We also have questions about how this affects our general communications that feature our program descriptions (website, social media, brochure).</li> <li>3. "Low Threshold" common criteria: Yes, there needs to be more year-round, low demand beds. However, there needs to be room for different modalities. Not all single adults want to be in a harm-reduction environment, so there should not be an across-the-board policy of harm reduction for all shelters. Nor will families come for help if they think they risk having their children next to people with untreated mental illness or sex offender status. Ascencia has operated a shelter that serves single adults and families in the same space for ten years. It works and our beds are always full. We invite County representatives to visit Ascencia and hear from our staff and clients about our emergency housing program.</li> <li>4. Bed assignment sounds as though the referring agency has the ability to make the placement. But the description is really about identifying vacancy. Built into this process should be a standard for referring agencies to call and confirm vacancy.</li> <li>5. Ascencia has successfully served families and individuals with companion animals at our 40 bed year-round shelter.</li> </ol>	
Center for the Pacific Agency Family	<p>Recommendation: The shelter needs of domestic violence victims – both emergency shelter and transitional housing – cannot be lumped together with the needs of other populations, including homeless families, and assumed that the needs are the same. LAHSA should be directed to separately analyze and present the shelter and permanent housing needs of domestic violence victims.</p> <p>Recommendation: Add language to ensure that bridge/interim housing programs will not follow a one-size-fits-all model: for example, shelter stays may need to extend beyond 90 days for certain individuals and families with special needs, such as victims of domestic violence who, for reasons of safety and trauma, may require longer shelter stays while permanent housing plans are being developed and implemented.</p> <p>Recommendation: For clarity, move strategy B7 (Interim/Bridge Housing for those exiting institutions) from the section on Subsidized Housing to Section E, to align and consolidate all references to interim housing in the strategy document.</p>	<p>This comment will be considered during the implementation planning process.</p> <p>This comment will be considered during the implementation planning process.</p> <p>Comment noted but not incorporated; however, the placement of a strategy in a particular category will not impact the way in which it is implemented.</p>

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Family Crisis Center	<p>Strategy: Strengthen the Emergency Shelter System</p> <p>Initial Draft Strategy Language for which Professional input is Given Below: “Transform emergency shelters and transitional housing into interim/bridge housing from which homeless families/individuals/youth could transition to the best suited form of permanent housing, such as rapid re-housing or permanent supportive housing. Housing location search assistance should be provided at each shelter by community-based housing locators, since such assistance is key to ensuring that the shelter system operates as effectively as possible with enough “throughputs” to move people out of the shelter system, thereby creating shelter capacity for additional homeless families/individuals/youth, including individuals and families fleeing domestic violence.”</p> <p>Professional Provider Input for Amendment to Draft: The shelter needs of domestic violence and human trafficking victims– both emergency shelter and transitional housing – cannot be lumped together with the needs of other populations. LAHSA should be directed to separately analyze and present the shelter and permanent housing needs of domestic violence and human trafficking victims.</p> <p>Professional Provider Input for Amendment to Draft: Add language to ensure that bridge/interim housing programs will not follow a one-size-fits-all model: for example, shelter stays may need to extend beyond 90 days for certain individuals and families with special needs, such as victims of domestic violence and human trafficking and for children who, for reasons of safety and trauma, may require longer shelter stays while permanent housing plans are being developed and implemented.</p>	These comments will be considered during the implementation planning process.
Neighborhood Legal Services of Los Angeles County	<p>NLSLA Strongly Supports Strengthening the Coordinated Entry System (E7), and Enhancing the Emergency Shelter System (E8), but Believes the Draft Should Address the Needs of Vulnerable Populations.</p> <p>Strengthening Coordinated Reentry (E7) and Enhancing Emergency Shelter (E8)</p> <p>Strategy E7 &amp; E8 call for an “increased emphasis on collaboration, sharing of best practices, and funding toward homeless assistance” to more effectively tap into underutilized yet available resources to help a broader group of individuals. NLSLA strongly supports the plans to leverage and expand existing programs.</p>	Comment noted.
Public	Emergency shelters are falling short for women and children; maybe you could put some dollars towards that effort.	Comment noted.
Public	Speaker identified seven large buildings in LA County which could be used as shelter; many already have rest rooms, showers, beds, cafeterias.	Comment noted.
Public	Supported the shelters staying open 24/7, used as a bridge they are meaningful, everyone has their own story, should not be categorized.	Comment noted.
Public	The onetime \$1.5 million will not be adequate to replace the over \$10 million/yr. that LAHSA defunded for transitional/bridge housing. The loss of 2368 beds county wide cannot be mitigated by this measure. In fact, the family transitional housing facilities being defunded are only open now due to emergency grants from county supervisors and cities.	Comment noted.

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Public	<p>Definitely needs a robust reporting back system to monitor implementation issues at the SPA level. My CES work in SPA 8 has me concerned with cities' involvement. There are about 15 cities in the So Bay – how involved will they be? What incentives? Could a “cheat sheet” for easy participation be created for cities? Can we find out which cities are already involved and interested?</p> <p>Landlord engagement – we’ve had a really difficult job getting people with vouchers into housing. Are landlord incentives enough? Seems like more is needed. Can a landlord summit be arranged to recruit support? Can anything be done to help with credit repair?</p> <p>Private hospitals have been dumping discharged patients at our winter shelter pick –up site. Can they be compelled to work with system? What incentives for them to participate?</p>	These questions will be addressed through the implementation planning process.
Public	I agree with the strategy as more emergency shelter is need but I hope that this does not mean the expansion of current WS programs. The winter shelter provider (not all but many) lack capacity to operate full-scale CES integrated programs. I encourage LAHSA to issue new RFP solicitation to ensure that the best providers across the SPAs provide this expanded service.	The focus of this strategy is year-round shelters.
Public	Winter shelters were criticized for lack of privacy as well as safety and health issues. Other options should be reviewed.	Comment noted. The focus of this strategy is on year-round shelters.
United Way of Greater LA	Include mention of exploring conversations of previously transitional living facilities (since they are likely more private and attractive bridge housing options). Also, reserve beds for those who are high priority targets in CES to increase flow out of shelter and also increase the ability to quickly find persons matched to housing.	Comment noted. As addressed in Strategy B7 – Interim/Bridge Housing for those Exiting Institutions, the opportunity to convert transitional living facilities into bridge housing is being actively explored.
<b>E9 – DISCHARGE DATA TRACKING SYSTEM</b>		
Ascencia	In addition to the comments in the beginning of this letter, please be sure to engage outreach workers and other case managers in providing guidance as this planning continues. Consider having a focus group at any agency site to gain a better understanding of the challenges they face in coordinating services when clients are institutionalized. In addition, Ascencia has a hospital liaison who is a former discharge planner and who now works closely with local hospitals who have homeless patients. Her experience could be very helpful to the planning process.	Comment noted.
<b>E12- ENHANCED DATA SHARING AND TRACKING</b>		
Downtown Women’s Center	We recommend that data on women’s homelessness be prioritized and made publicly available. A first step would be de-aggregating the 2016 Homeless Count by gender across data points. 2. Ensure	This comment will be considered during the implementation planning

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	women’s needs are being fully met through housing and services in LA County. We know that 13,587 of the County’s homeless population are women, yet beyond this basic data, there is a dearth of information on how services and housing are meeting the needs of this particular subpopulation. Having data on homelessness de-aggregated by gender is an essential step to knowing whether women’s needs are being met, and to developing targeted and thereby effective approaches to ending homelessness for women.	process.
Downtown Women’s Center	Enhanced Data Sharing and Tracking <ul style="list-style-type: none"> <li>• Add women as a target subpopulation in “5) Develop Countywide targets to reduce chronic, veteran, family, single adult and TAY homeless”</li> </ul>	This comment will be considered during the implementation planning process.
<b>E14- ENHANCED SERVICES FOR TRANSITION AGE YOUTH</b>		
Hollywood Homeless Youth Partnership	<p>The Hollywood Homeless Youth Partnership (HHYP) respectfully submits comments on the LA County Homeless Initiative with special regard to proposals to address Transition Age Youth (TAY). The HHYP is an alliance of 6 agencies – Children’s Hospital Los Angeles, Covenant House California, Los Angeles LGBT Center, Los Angeles Youth Network, My Friend’s Place, and Step Up on Second – working collaboratively to end youth homelessness.</p> <p>Representatives from various HHYP agencies attended the convening of youth providers around \$3M in funding for homeless TAY programs on January 20, 2016. While we are pleased with the proposal to allocate \$1M to Youth CES, \$2M for the housing continuum for TAY (including emergency shelters, transitional living programs, etc.), and \$2M towards Rapid Rehousing for youth, we recognize that a one-time contribution of \$5M towards TAY is not a proportional amount of spending in contrast to the needs of young people in Los Angeles.</p> <p>We believe LA County can build upon existing public and private investments by:</p> <ul style="list-style-type: none"> <li>• Supporting innovative models to prevent youth homelessness. In order to see a dramatic decrease in the number of young people living on our streets, we urge the County to look to innovative models that have been implemented in other regions to shape a design that fits the needs of our community.</li> <li>• Increasing the length of subsidy and allowable case management costs for Rapid Rehousing targeting TAY. Transition age youth moving into independent housing for the first time will likely require housing subsidies for a longer period of time 12 – 18 months and more intensive case management to retain them in housing.</li> <li>• Designating funds to help TAY find, secure, and keep housing. Many youth and young adults experiencing homelessness need support through the whole process of finding housing, filling out housing applications, understanding leases, and developing the skills that they need to retain housing.</li> </ul> <p>We thank you again for your investment towards efforts to end homelessness in Los Angeles County and</p>	This comment will be considered during the implementation planning process.

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	look forward to engaging with the County to ensure the needs of youth experiencing homelessness are met. For more information, please contact Tiffany Jamoralin, Network Manager, at tjamoralin@chla.usc.edu.	
<b>E15 – HOMELESS VOTER REGISTRATION AND ACCESS TO VITAL RECORDS</b>		
Downtown Women's Center	Homeless Voter Registration and Access to Vital Records • Add ensure that voter polling locations are in nearby proximity to homeless services	Recommendation incorporated.
<b>E17-REGIONAL HOMELESSNESS ADVISORY COUNCIL AND IMPLEMENTATION COORDINATION</b>		
Downtown Women's Center	Regional Homelessness Advisory Council and Implementation Coordination • Add Community Based Organizations to 'Collaborating Departments/Agencies	The strategy has been revised based on this comment.
United Way of Greater LA	Direct the regional advisory group to set annual goals for itself on 1) length of time homeless; 2) permanent housing placements; 3) returns to homelessness (recidivism). Each of these can be overall for the system + by population.	The strategy has been revised based on this comment.
<b>F. INCREASE AFFORDABLE/HOMELESS HOUSING</b>		
City of Santa Monica	<p>Increase Affordable/Homeless Housing</p> <p>The City agrees with the value and importance of increasing affordable housing units, especially units for extremely low-income individuals and families. Within the strategy for using public land for increasing affordable/homeless housing, the City strongly recommends that the county facilitate and encourage multiple jurisdictions to collaboratively develop and fund regional affordable/ homeless</p> <p>The County recommended strategies to increase the number of Permanent Supportive Housing vouchers is admirable. However, throughout much of the region, the cost of rent exceeds the Voucher Payment Standard set by HUD. This creates challenges for clients to find units within the allowable rent limit.</p> <p>As a result there a many clients who currently have supportive housing vouchers and cannot find an eligible unit. To address this issue there needs to be a significant increase in the supply of affordable housing units, and since the time to build new units can be up to five years when 100 percent financed via public sources, it seems that market rate housing currently seeking entitlements provides the best opportunity to build quickly.</p> <p>The City suggests that Los Angeles County act aggressively versus cautiously in this policy area of</p>	This comment will be considered during the implementation planning process.

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	<p>inclusionary housing. In a strong rental market, where construction of rental housing development is nonstop throughout Los Angeles County, inclusionary housing could far outstrip the production of decades of redevelopment financed units. The nexus study and policy proposal should be expedited. Geographically, Santa Monica is an affordability island on Los Angeles' Westside. Without inclusionary housing in neighboring Venice, Marina Del Rey and West Los Angeles, Santa Monica faces undue pressures to house individuals and families who are homeless or displaced.</p> <p>Acknowledging that legal concerns exist regarding inclusionary policies, the City suggests that the County also investigate whether inclusionary housing can be tied to discretionary approvals and offer multiple opportunities to developers to satisfy required commitments to affordable housing.</p>	
Los Angeles Mission	<p>Housing and Home Ownership</p> <p>We strongly support the need for additional affordable housing options. We would note there is a distinct motivational difference between rental and homeownership as a hope of the homeless. While exploring affordable options, consideration should be given to program options that allow individuals to create equity in or towards ownership. Integrating something like a Habitat for Humanity strategy could benefit both governmental long term goals of housing independence and personal goals of hope and independence.</p>	Comment noted.
Public	<p>I might be a good resource for your team as I developed Orange County's first SRO. That was in 1996. I did this by converting a Motel into permanent living units. I was on the OC Homeless Issues Task Force and work with Govt and local non-profits. I believe that we could assemble thousands of housing units by simply retro-fitting current unused motel units and buildings. Most motels are built with a meeting room where social services could interact with the population. I know how to do this and still comply with the building code. Contact me if you feel I could be useful.</p>	This comment will be considered during the implementation planning process.
Public	<p>I would like to suggest that a property management company such as Brilliant Corners be utilized to assist with the location and acquisition of permanent housing vacancies. My agency has worked with BC for a little over a year now and would not have been able to house as many persons as we have, had it not been for their assistance and role as a housing liaison with landlords. If a property mgmt. company was either attached to each subsidy such as RRH or per SPA, this would allow homeless persons to be housed more expediently and successfully.</p>	This comment will be considered during the implementation planning process.
Public	<p>Ultimately, we need housing in this city. Roughly 500,000 units from most estimates. We need to build affordable housing but I vote for land use because ultimately we need to figure where to build this housing. Creating small cottage villages, as referenced in the brief, is a great way to quickly house the chronically homeless. They provide shelter, privacy, and health. Plus, we can simplify and unite services in these locations and have quality of life officers in the area to ensure public safety. They should not be too massive to attract NIMBYism.</p>	This comment will be considered during the implementation planning process.

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Public	There is a list of abandoned building that are currently chained up. For e.g., a foreclosed property on 810 Beacon Avenue that houses 250 people. Non-profits can purchase, rehab and operate this building. They partnered and purchased the property, but it is sitting vacant. It also addresses blight in the community.	This comment will be considered during the implementation planning process.
<b>F1- PROMOTE REGIONAL SB 2 COMPLIANCE AND IMPLEMENTATION</b>		
Ascencia	It is not clear why a consultant should be hired to do this. Why wouldn't the State Department of Housing and Community Development be responsible for enforcement? If the enforcement mechanism is not clear, then the recommendation should be to change policy to include.	The County wants to try a proactive approach to encourage/assist cities to comply.
Legal Aid Foundation of Los Angeles	<p>Increasing Affordable/Homeless Housing—Land Use</p> <p>We support the creation of clearer development standards which could maximize incentives and opportunities to create emergency housing for homeless individuals and families while maintaining an appropriate balance of land uses. As stated above, as a unifying jurisdiction, the County has a unique opportunity to move the region towards viable solutions and remove barriers that block options for helping those experiencing homelessness. For example, the development of model policies which would facilitate the implementation of standards in smaller cities will serve to increase the potential creating additional emergency housing. The following specific observations and recommendations address recommended strategies in this area:</p> <p><input type="checkbox"/>Strategy F1- Facilitating SB 2 Implementation throughout Los Angeles County</p> <p>We support the development of model policies which address common SB2 compliance issues such as impermissibly restrictive proximity restrictions, and which facilitate the development of shelters through assistance with identification of appropriate zones for such development, by presenting options for dealing with negative attitudes, and which promote the siting of emergency housing in appropriate areas. At the same time, it is important to recognize that emergency shelters are not a solution to homelessness or a substitute for appropriate housing. They truly are emergency shelters, which should not be overly relied upon to house our homeless population on a long-term basis. Rather homelessness in LA County requires a comprehensive approach, of which short-term emergency housing is a component, which is geared towards the successful provision of both long-term, appropriate housing and supportive services to those individuals who need them.</p>	Comment noted.
Public Counsel	<ul style="list-style-type: none"> <li>• This recommendation is a good first step to ensuring all cities across the County participate in the creation of shelter and housing needed to end homelessness.</li> <li>• Adopted in 2007, SB 2 ensures that local zoning facilitates the development of emergency shelters, transitional, and supportive housing. However, in our experience, many cities are still not in compliance with the statutory mandate. In addition to removing barriers to development of shelter and housing for our clients, SB 2 implementation will help ensure that cities are eligible for certain state and federal funds.</li> </ul>	Comment noted.

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	<ul style="list-style-type: none"> <li>Since 2008, Public Counsel has provided technical assistance to cities working toward SB 2 compliance. While the County’s proposed template ordinance and best practices guide will serve as important tools, proper SB 2 implementation requires individualized, one-on-one technical assistance tailored to each city’s needs.</li> </ul>	
<b>F2 – LINKAGE FEE NEXUS STUDY</b>		
Public	<p>In response to the Homeless Initiative recommendations:</p> <p>I’d like the Board of Supervisors to consider more priority be given to turning existing available buildings into housing &amp; shelter facilities as well as immediate action on zoning changes, revisiting rent control, inclusionary zoning, linkage fees &amp; minimum wage.</p> <p>There is a lot of focus on subsidized housing &amp; voucher but without housing there is nowhere to use them. We’ve got a super hot market that developers are falling all over themselves to get into - development will not grind to a halt if those requirements are put forth – we may even attract some developers of mixed income housing who understand how this type of development successfully addresses the scarcity of affordably priced housing and makes better neighborhoods for the betterment of mankind. But the developers need strong support from local government to defuse and overcome community opposition. That is where you come in – let’s start being pro-active instead of reactive. Let’s be the city that ‘sets the standard’ of caring for our neighbors – we are Los Angeles after all.</p> <p>This is the opportunity to stop doing things just because it’s ‘the way we’ve always done them’. Whatever action is taken is going to require concession and collaboration, not only between the County and the City, or the internal departments involved but also from all of us who live here in Los Angeles. Please do not forsake the mission for the sake of the position – we need to give our neighbors better options that sleeping on a sidewalk. Thank you for the opportunity to comment.</p>	Comment noted.
Legal Aid Foundation of Los Angeles	<p>Development of Linkage Fee Ordinance</p> <p>LAFLA supports the development of a linkage fee program. LAFLA supports policies which ensure that capture the benefits of proposed development projects for the community members which may be impacted by those projects, including through potential displacement resulting from the increase of property values and prices in the neighborhoods where they are located. It is entirely appropriate for developers to be required to provide benefits which meet the needs of the local community in exchange for the benefits that siting a development project in a given community may confer on the developer. Any successful linkage fee program must be based on high-quality, current data and information. LAFLA</p>	Comment noted.

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*Responder	Comment	Response
	<p>agrees the linkage fee could be based on the 2011 Nexus Study, though it may need a short update to ensure any linkage fee take into account current trends in property development activity, vacancy rates, housing availability and affordability, and homelessness. Similarly, any successful linkage fee must be developed in close consultation with community stakeholders of all types. This includes significant engagement of low-income renters, small business owners, homelessness advocates, neighborhood institutions and affordable housing developers, among others.</p>	
<p>Neighborhood Legal Services of Los Angeles</p>	<p>First, while it cannot be the only source of funding for affordable housing, the implementation of an Affordable Housing Benefit program ordinance (also known as a linkage fee ordinance) is an essential tool for increasing access to housing for the residents of Los Angeles County. NLSLA supports the proposal to allocate funds to conduct a nexus study to document the link between new development and increased need for affordable housing. Such a study is the necessary first step towards implementing a one-time impact fee on new development, which could be a major source of funds to support the production of affordable housing. As noted in the strategy brief on this issue, a City of Los Angeles study determined that a linkage fee could raise up to \$112 million annually for the city.</p> <p>Second, NLSLA urges the County to ensure that funds generated by a linkage fee are used primarily for the benefit of those most in need. For example, the City of San Diego requires that at least ten percent of the funds generated by its linkage fee ordinance be spent on transitional housing, and at least sixty percent be spent on housing affordable to very low income families, defined as those with incomes at or below fifty percent of the area median income. The County should likewise require that most linkage fee funds be spent on homeless and transitional housing, housing for very low income families, and housing for extremely low income families (defined as those with incomes at or below thirty percent of area median income), and dedicate specific percentages to each. Such requirements will ensure that the housing created with funds from linkage fees is within the reach of those most vulnerable.</p>	<p>Comment and suggestions noted.</p>
<p>Public</p>	<p>Can we impose homeless initiative tax on the developers</p>	<p>No, neither the County, nor cities have the authority to impose such a tax, though the County and cities do have the authority to impose a linkage fee on development. A Linkage Fee Nexus Study, as described in this strategy, must be completed before the County can consider the adoption of a linkage fee in the unincorporated areas.</p>
<p>Neighborhood Legal Services of Los Angeles</p>	<p>NLSLA Strongly Supports Strategies to Increase Affordable Housing, Particularly Through the Linkage Fee Study (F2), and the Development of a Second Dwelling Units Pilot Program (F4).</p>	<p>Comment noted.</p>

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
County	<p>NLSLA applauds the recognition that the lack of affordable housing is a substantial contributor to homelessness, and urges the drafters not overlook this crucial insight as it finalizes its homeless initiative priorities. There can be no lasting solution to the homeless crisis without a solution to the current affordable housing crisis, for the two go hand-in-hand. Thus, while the Draft strategies aimed at increasing the supply of affordable and homeless housing are an important first step, NLSLA believes the County must substantially increase its investment in affordable housing if it is to effectively combat homelessness in the long-term.</p> <p>The affordable housing crisis is well-documented. One University of Southern California study recently concluded that “[t]he rental market in Southern California is the least-affordable it [has] ever been.” From 2000 to 2012, the inflation-adjusted median rental rate in Los Angeles County increased 25 percent, while the inflation-adjusted median income dropped by nine percent. The impact of these sky-rocketing rents on vulnerable low-income families is apparent in NLSLA’s work with tenants facing eviction throughout the County. Among the thousands of families NLSLA works with each year, a simple inability to pay escalating rent is far and away the most common reason that families are forced to leave their homes and exposed to the risk of temporary or longer term homelessness. Substantial investment in affordable housing is essential to protect these families and achieve a lasting solution to the homeless crisis.</p>	
<b>F3- SUPPORT INCLUSIONARY ZONING FOR AFFORDABLE HOUSING RENTAL UNITS</b>		
Public	<p>Low income affordable home ownership incentives. Would luv 2 B an homeowner... Rental properties should have units set aside 4 low income. If getting tax credits or incentives, senior building should have low income options to provide lower income rentals.. Mexican/ white/Asian/managed building don't rent to this black person...why? Want deposits but don't rent.. I've lived in my car 4 two 1/2 years now. Have income: disabled state retirement. Can't afford 2bdm....what else can I do? I'm trying... I need some help and guidance.</p>	Comment noted.
Public Counsel	<ul style="list-style-type: none"> <li>• Inclusionary housing is an important part of a strategy to increase the stock of affordable rental units. We applaud the leadership of the Homeless Initiative and urge the Board to strongly support amendment or clarification of state law to allow for the County to consider an inclusionary housing requirement for rental housing.</li> <li>• This strategy is not identified as a “Priority Strategy,” yet effective implementation will be dictated by the state legislative calendar. The County must be poised and prepared to engage according to the legislative timeframe</li> </ul>	Comment noted. The County will be prepared to advocate with the State Legislature and the Governor at the appropriate time, as dictated by the legislative calendar.

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
<b>F4 – DEVELOPMENT OF SECOND DWELLING UNITS PILOT PROGRAM</b>		
Legal Aid Foundation of Los Angeles	<p>Increase Development of Second Dwelling Units</p> <p>Given the need for affordable housing, and the reality that new construction is not projected to fill that need, it is imperative that we do everything possible to preserve existing affordable housing units that are safe and habitable while incentivizing the construction of a range of additional affordable housing options. Second dwelling units represent a piece of this puzzle, and are an appropriate housing option for many of the County's low-income residents. Often, the complications and cost of receiving engineering approvals can stand in the way of the construction of a second dwelling unit.</p> <p>In addition to the recommended strategies, we encourage the County to explore the development of pre-approved architectural plans which would not require extensive engineering approvals. This is a measure which has been taken elsewhere, and is discussed but not explicitly recommended in the Strategy Brief.</p>	Suggestion incorporated.
Neighborhood Legal Services of Los Angeles County	NLSLA also agrees with the proposal to support the development of second dwelling units. Many clients seeking help from NLSLA reside in unpermitted second units in the backyards or garages of single family homes. The conditions in these units are frequently unsafe – gas stoves with dangerous home-made hook-ups, inadequate plumbing, and other hazards are common – but families who cannot afford the rent at typical apartments often find that unpermitted second dwelling units are their only option. For owners, renting out a second dwelling unit is often the only way to make monthly mortgage payments. These units exist out of necessity, and will persist regardless of their legal status. A process to legalize second dwelling units will bring them out of the shadows, ensure that they are safe and up to code standards, and preserve a source of inexpensive alternative housing that is within reach for residents who might otherwise face homelessness.	Comment noted.
Public	Develop some standard architectural plans for second units so homeowners do not have to hire someone to do it.	Suggestion incorporated.
Public	We need a set aside law, only Santa Monica and W. Hollywood has such laws, now may be an optimal time to put this in place with the heightened awareness of the homeless and the massive amount of building apartments going on at the present time.	Suggestion noted.
Public Counsel	Consider requiring covenanted affordable units on sites that seek legalization of existing unpermitted units.	This suggestion will be considered as part of the implementation planning process.
Neighborhood Legal Services of Los Angeles County	<p>NLSLA Strongly Supports Strategies to Increase Affordable Housing, Particularly Through the Linkage Fee Study (F2), and the Development of a Second Dwelling Units Pilot Program (F4).</p> <p>NLSLA applauds the recognition that the lack of affordable housing is a substantial contributor to homelessness, and urges the drafters not overlook this crucial insight as it finalizes its homeless initiative</p>	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
	<p>priorities. There can be no lasting solution to the homeless crisis without a solution to the current affordable housing crisis, for the two go hand-in-hand. Thus, while the Draft strategies aimed at increasing the supply of affordable and homeless housing are an important first step, NLSLA believes the County must substantially increase its investment in affordable housing if it is to effectively combat homelessness in the long-term.</p> <p>The affordable housing crisis is well-documented. One University of Southern California study recently concluded that “[t]he rental market in Southern California is the least-affordable it [has] ever been.” From 2000 to 2012, the inflation-adjusted median rental rate in Los Angeles County increased 25 percent, while the inflation-adjusted median income dropped by nine percent. The impact of these sky-rocketing rents on vulnerable low-income families is apparent in NLSLA’s work with tenants facing eviction throughout the County. Among the thousands of families NLSLA works with each year, a simple inability to pay escalating rent is far and away the most common reason that families are forced to leave their homes and exposed to the risk of temporary or longer term homelessness. Substantial investment in affordable housing is essential to protect these families and achieve a lasting solution to the homeless crisis.</p>	
<b>F5- INCENTIVE ZONING/VENTURE CAPTURE STRATEGIES</b>		
Legal Aid Foundation of Los Angeles	Incentive Zoning/Value Capture Strategies LAFLA supports the development of policies which balance the benefits developers experience from building in Los Angeles County with the impacts of development projects in neighborhoods by requiring the provision of community benefits (either through fees or in-kind) as a condition of development. LAFLA encourages coordination of this policy with those contemplated in the Equitable Development Tools Motion presented by Supervisor Solis on December 8, 2015.	Comment noted.
Public Counsel	<ul style="list-style-type: none"> <li>• In addition to tax increment and other fund generating tools, the value capture concept should also be applied to zoning practices. The feasibility study must assess strategies requiring affordable housing in conjunction with zone changes and general plan amendments that increase residential density or allow residential use where it was not previously permitted.</li> <li>• Incentive zoning strategies should include the creation of incentives for greater and deeper affordability (e.g., units affordable to households at 30% of area median income), and must require that any project receiving an incentive replace all affordable units that are or have been on site within five years, pursuant to AB 2222.</li> <li>• We encourage close coordination with the implementation of the Board’s December 15, 2015 motion on equitable development tools.</li> </ul>	This comment will be considered as part of the implementation planning process.

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## County of Los Angeles Homeless Initiative Public Comments

*Responder	Comment	Response
<b>F6 - USING PUBLIC LAND FOR HOMELESS HOUSING</b>		
Legal Aid Foundation of Los Angeles	Using Public Land for Homeless Housing LAFLA strongly supports the suggested use of public land for affordable housing. As acknowledged by a range of stakeholders, we are facing a true emergency when it comes to the increasing levels of homelessness and concurrent lack of affordable housing in Los Angeles County. Each and every stakeholder must do its part and commit all available resources if we are to address these issues. LAFLA encourages the County to undertake a comprehensive inventory of all public land and buildings held by County agencies and departments, as well as by associated entities such as Metro, in pursuit of this strategy. LAFLA encourages the County to not only consider vacant land in connection with this strategy, but also those County buildings which may be vacant or under-utilized and appropriate for conversion to affordable housing.	As specified in the description of this strategy, public land with under-utilized facilities and facilities that are no longer needed will be considered, as well as vacant public land.
Public	Housing issues: How will the County identify locations required for the massive housing requirements and how will the County handle the issue of NIMBY with the constant pushback from the community. Will eminent domain be an option?	These questions will be considered as part of the implementation planning process.
Public	Housing should be focused on long term solutions; build housing not for transition but for long term and supporting services must be attached.	Comment noted.
Public	I fully endorse the notion to use Public land for affordable housing, but I would lease the land to Nonprofit Housing Developers for \$1 and let them get all of the financing needed. The same idea applies to County owned buildings which are not being used. The only oversight would be to make sure that these properties are being developed properly.	This recommendation will be considered during the implementation planning process.
Public	Should be a priority. We should engage developers, housing is booming and we should do what we can to collaborate with the developers to build mixed use, affordable housing.	All strategies are important; this strategy is not part of Phase 1 because it will take longer to implement than some of the other strategies.

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## County of Los Angeles Homeless Initiative Public Comments

GENERAL COMMENTS		
*Responder	Comment	Response
Public	Poverty is the main catalyst for crime. LAPD get 1 billion annually and still can't prevent crime. Take LAPD's over fat budget and create community centers in every neighborhood with homeless issues. Take LAPD's billion annual dollars and use it for whatever you people claim the fake inflated property market brings the county. When you reduce poverty, reduce a lack of housing, and reduce a lack of access to mental health you reduce crime. Money better spent than throwing it away on a useless police force.	LAPD is a Los Angeles City entity. The County has no jurisdiction over the LAPD or the LA City budget.
Public	Target recruitment and hiring of homeless to work on any new homes that will be developed as part of the Homeless Initiative, to provide a sense of ownership in the community. This will provide them with recent/current employment as a means to have recent job experience in order to build a current resume.	Strategies C2 and C3 provide expanded employment opportunities for homeless individuals.
Public	Target recruitment and hiring of homeless to work on any new homes that will be developed as part of the Homeless Initiative in order to provide a sense of ownership in the community. Housing projects have been built time and time again from military housing to even FEMA camps. What will be different is the pride that comes from putting the hinges on your own door or putting in your own windows. Similar to Habitat for Humanity. People or less likely to ruin, riot or tear down the communities they have built with their own hands and sweat. It doesn't need to be a requirement but if it's going to be done do it right.	Strategies C2 and C3 provide expanded employment opportunities for homeless individuals.
Public	Winter Shelter Program (WSP) is an opportunity to help people become employment ready.	WSP is a short-term program and shelters are only open at night, except in severe inclement weather; therefore, only a limited range of services are provided.
Alta Med	I would like to see how health care providers are involved in this discussion. Many of our patients are affected by homelessness making it difficult for them to have adequate access to care and continuous care. Homeless patients come into our system because they just want a warm bed and a hot meal. At Alta Med we are interested in being part of the solution to improve the quality of care that our homeless population receives and to drive down the cost impact on inpatient days.	Healthcare providers will have an important role in the implementation of various strategies, including E3 and E17.
Ascencia	Several very good recommendations in this document were the focus of hours of multi-agency planning meetings many years ago. These include ideas such as universal data elements and discharge planning. It is surprising that these past efforts were not mentioned in the strategy briefs since some of the same people involved in those earlier meetings are leading the current ones. The strategy references goals such as how agencies should "collaborate closely" or have "coordination" or "integration," but it is not clear what that means or how it would work in the context of County operations. These concepts are well-meaning, but need to be more clearly articulated. The strategies do not indicate how the implementation process will draw on the wealth of experience	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

	<p>garnered by the nonprofit homeless service organizations who have been at the forefront of innovation and best practices in ending homelessness. The County should take into consideration the cycles that drive the work of these organizations. For example, the majority of planning meetings to inform this strategy occurred in November and December, exactly when nonprofit agencies are engaged in their most crucial time of fundraising and year-end close-outs.</p>	
<p>Children’s Hospital Los Angeles</p>	<p>The Division of Adolescent and Young Adult Medicine at Children’s Hospital Los Angeles (CHLA) has been providing health, mental health, and substance abuse treatment services to homeless youth in our community for over 30 years and has worked collaboratively with local agencies providing youth-specific outreach, shelter, transitional living, and housing programs to youth experiencing homelessness through the Hollywood Homeless Youth Partnership for almost 20 years. Currently, the Division of Adolescent and Young Adult Medicine is the lead agency for the Youth CES Pilot being conducted in Hollywood. As a provider with a specific interest in youth homelessness, I feel obliged to provide comments based on our perspective.</p> <ul style="list-style-type: none"> <li>• Reliance on one time only funding – Much of the plan indicates that recommendations will be addressed with one time only funding. Unfortunately, homelessness in our community emerges from complex and intransigent factors that are not amenable to one time only fixes. Though there are certainly structural changes that might be one time only investments, preventing homelessness and changing the trajectory of homeless individuals will require on-going resources and support.</li> <li>• \$5 million allocation for Youth –Due to the fact that over 10% of the homeless population are Transitional Age Youth, it is concerning that only 5% of resources were allocated to this population.</li> </ul>	<p>TAY are addressed specifically in various strategies, and included in all strategies that provide services to the general population, as needed; therefore, the \$5 million for Strategy E14 – Enhanced Services for Transition Age Youth is not a limit on the funding that will be utilized for housing and services for TAY.</p> <p>The County recognizes the need for ongoing funding and is working to identify ongoing revenue solutions.</p>
<p>City of Los Angeles (Councilmember David Ryu)</p>	<p>Thank you for your public outreach efforts and attention to homelessness in Los Angeles. Community input is vital to developing a coordinated strategy to effectively combat what has become nothing less than a state of emergency.</p> <p>As the County moves forward with a comprehensive strategy to combat homelessness, it is imperative that we take stock not only of what is contemporary and visible, but also of what can be foreseen and its root causes. Two priorities that my office has been working to address are:</p> <p>Mental Health and Substance Abuse Coverage:</p> <p>For far too long, mental health and substance abuse coverage has been treated as an afterthought. Young people, the homeless, veterans and mentally ill people, many of whom are abusing alcohol and drugs, still struggle for access to treatment. Existing services are provided by the Los Angeles County Departments of Public Health and Mental Health, yet multiple departments and funding sources create confusion, duplicative work and gaps in service. There is a need to assess how those with mental health issues will be treated under the new strategy and what treatment programs will be utilized to ensure that those being served are on a path to self-sufficiency.</p>	<p>Comment noted.</p> <p>Strategies E2, E3 and E16 are intended to address this issue.</p>

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## County of Los Angeles Homeless Initiative Public Comments

	<p>Funding for Interim Housing and Domestic Violence Shelters:</p> <p>As a result of the federal government’s recent move toward a Housing First model and strategy, the Los Angeles Homeless Services Agency (LAHSA) voted to defund domestic violence and homeless veteran shelters in Los Angeles. Closing these programs could limit interim housing options to fully half of our homeless population. I encourage the Board to take an accounting of those shelters slated for closure and identify a dedicated source of revenue to continue providing these services.</p> <p>Establishing a Single Contact Number for Homeless Services:</p> <p>Residents and even our Council Office are often not able to reach the right service provider at the right time for homeless issues that arise. Because there are so many issues that can occur in regards to homelessness, such as public safety, sanitation, mental health, and shelter needs, and many SPAs that those issues can occur in, there are literally hundreds of phone numbers that could be the right contact for any one issue. Unfortunately, this means few people know who to call when. An issue we have wanted to address is bridging that gap. Whether that means integrating that knowledge for 311 operations or taking a look at how 211 can be used by those reporting issues rather than looking for help themselves, are all areas we are looking into as good options for a one-stop call number for homeless services.</p> <p>Please find, below, the URLs to three motions related to the above mentioned priorities that my office has introduced in City Council:</p> <p><a href="http://clkrep.lacity.org/onlinedocs/2015/15-1035_mot_9-1-15.pdf">http://clkrep.lacity.org/onlinedocs/2015/15-1035_mot_9-1-15.pdf</a>  <a href="http://clkrep.lacity.org/onlinedocs/2015/15-1357_mot_11-17-2015.pdf">http://clkrep.lacity.org/onlinedocs/2015/15-1357_mot_11-17-2015.pdf</a>  <a href="http://clkrep.lacity.org/onlinedocs/2015/15-1360_mot_11-17-2015.pdf">http://clkrep.lacity.org/onlinedocs/2015/15-1360_mot_11-17-2015.pdf</a></p> <p>Thank you once again for your continued commitment to ending homelessness in Los Angeles and I look forward to working with each of your offices in the months and years to come.</p>	<p>Recommendation noted.</p> <p>Recommendation noted. This comment will be addressed in the implementation planning process for Strategies E6 and E7.</p>
<p>City of Santa Monica</p> <p>Rick Cole City Manager</p>	<p>Thank you for the opportunity to participate in the policy summits and to provide written comments on the County of Los Angeles Homeless Initiative Draft Recommended Strategies to Combat Homelessness. The City of Santa Monica (‘City’) has a long history of addressing homelessness through the implementation of strategic initiatives and best practices, as well as through ongoing collaboration, advocacy, and action.</p> <p>Overall, the inclusiveness and sense of immediacy associated with the development of these strategies is impressive. One overriding concern of the City is that most of the funding sources are short-term and drawn from other important community serving programs. The City urges the County</p>	<p>Comment noted. The County recognizes the need for ongoing funding and is working to identify ongoing revenue solutions.</p>

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## County of Los Angeles Homeless Initiative Public Comments

	<p>to consider ways to implement permanent funding sources for the 2017-18 fiscal year. This timeline would provide the County about one year to test the strategies and devote resources to the most promising and proven approaches. The City of Santa Monica is committed to continued dialogue and collaboration with the County of Los Angeles to ensure that the needs of the homeless, particularly those who are the most vulnerable, can be met.</p> <p>To further the collaborative work that lies ahead, the City recommends that this effort implement a continuous improvement policy. Flexibility, especially at the local level, will foster innovation that may differ across communities depending on the diverse types of homeless challenges they face. Information sharing is also a part of a continuous improvement strategy, and providing opportunities to share successful models would benefit these efforts. When we move to the implementation phase, the City encourages the County to engage local experts with proven track records, scalable programs, and successful training modules. The City of Santa Monica has reduced homelessness by 19 percent since 2009 and is prepared to share strategies and provide leadership so that other communities can replicate the successful initiatives.</p>	<p>The County is committed to maintaining an inclusive and collaborative process through the implementation planning and implementation phases of the various strategies.</p> <p>We look forward to working with the City of Santa Monica and all other interested cities.</p>
Covenant House California	The policy areas are vague and confusing.	Comment noted. As a result of public comment, some strategies have been clarified/strengthened.
Downtown Women's Center	We recommend that the City, County, and LAHSA add to their criteria for funding decisions the need to demonstrate how applicants are effectively addressing the unique needs of unaccompanied women experiencing homeless.	This comment will be considered during the implementation planning process.
Hospital Association of Southern California	<p>The Hospital Association of Southern California (HASC) which represents over 85 hospitals in Los Angeles County wishes to provide comment on the Draft Recommended Strategies to Combat Homelessness. We appreciate the County of Los Angeles' commitment to convening a series of policy summits that collectively resulted in 47 draft recommendations.</p> <p>The magnitude and continued growth in homelessness requires both a coordinated and sustained long-term effort to effectively address this complex social issue. HASC is pleased that the report recognizes that hospitals are subject to unique and complex regulations. The Center for Medicaid and Medicare Services (CMS) for example released a proposed rule that requires that a discharge plan be layered with caretaker involvement for all patients – problematic for homeless individuals. HASC encourages the Board of Supervisors and the associated workgroup that may be subsequently convened to adopt policies that are consistent with applicable state and federal regulations.</p> <p>A hospital's primary role is to treat and stabilize a patient's emergent medical condition. Hospitals make discharge arrangements (H&amp;S 1262.5) to integrate a patient back into the community based on their individual needs and available resources. Hospitals have also become a community resource for homeless individuals who seek temporary shelter from weather and other elements associated</p>	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

	<p>with homelessness by simply sitting in an emergency department's waiting area. Insufficient community resources that provide immediate access to housing for homeless individuals who do not meet recuperative care criteria is an enormous challenge for hospitals. As a result, HASC is pleased that the Chief Executive Office has identified subsidized housing as a priority that must be addressed for hospitals and other institutions that come in contact with homeless individuals.</p> <p>HASC appreciates the proposed short and long term strategies for sheltering the estimated 44,359 individuals that the Los Angeles Homeless Services Authority (LAHSA) reported were homeless in 2015. The Coordinated Entry System (CES) can be instrumental in linking homeless individuals to the key strategies outlined below, as well as other community-based resources. This system builds on the 'no wrong door concept' by connecting people to the appropriate housing, health and community based social service programs they are eligible for and allow agencies to coordinate (e.g., case management) behind the scenes. Hospitals that have engaged with their local CES report that this system, when properly staffed and funded, can serve as a centralized one-stop repository for case managers and discharge planners thereby reducing a patient's wait-time.</p> <p>While the 47 recommended strategies are all worthy of implementation given the magnitude of the problem, this comment letter is limited to subsidized housing via the Coordinated Entry System. The hospital community urges adoption of the following strategies along side a robust CES.</p> <p>Thank you for your time and the opportunity to provide comment. The recommended draft strategies demonstrate a renewed effort to proactively address the contributing causes of homelessness, as well as solutions for those who call the street home. HASC looks forward to working with the County of Los Angeles to identify new and existing community resources that aid in effective placement opportunities to better serve our homeless individuals. Adequate capacity and access to the above housing programs is essential to our common goal of ending homelessness.</p>	
Housing Works	<p>Overall, this draft shows a lack of understanding/acknowledgement of the county's role in exacerbating and perpetuating homelessness in Los Angeles. There is nothing in the document that considers the critical need for county DMH and DPH/SAPC services to be radically changed so that access to these services is made on-demand (greatest problem among homeless persons is untreated mental illness and addiction); so that access to the housing resources these county agencies control are made available on a "housing first" basis (best practice) to homeless persons challenged by mental illness &amp; substance abuse.</p> <p>OVERVIEW (PG.1)</p> <p>PLEASE RECONSIDER THIS WORDING: ".. The Los Angeles County Board of Supervisors launched the Homeless Initiative to combat the homeless crisis that continues to plague our communities".</p> <p>This is offensive. We have a shelter &amp; housing crisis, and people forced to live on our streets. They</p>	<p>Comment noted.</p> <p>Language has been modified. The word "plague" has been deleted.</p>

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## County of Los Angeles Homeless Initiative Public Comments

	<p>are not a disease to be eradicated.</p> <p>CURRENT COUNTY EFFORTS (PG. 1-2)</p> <p>Diversion Plan: to divert mentally ill individuals out of the criminal justice system. This is a great plan &amp; has potential!! But it does NOT prevent/decrease homelessness. They leave the jail to???</p> <p>THE PRIORITIZED ELEVEN STRATEGIES</p> <ul style="list-style-type: none"> <li>Majority of the strategies involve assembling working groups or consultants to plan. This is a plan to plan. This is disappointing and frustrating for those of us who put real time and energy toward informing this during the summits. In comparison, the City plan is well-researched, thorough in its analysis and strategies.</li> <li>“LAHSA to collaborate with DMH, DPH, DHS, DPSS, CDC, Probation to draft and adopt a definition of supportive services and establish standards for high-quality supportive services for persons in PSH”. PLEASE! This has been done thoroughly and with massive input by United Way Home for Good locally, and by Corporation for Supportive Housing nationally. The issue is disseminating the info, training, buy-in by providers, and FUNDING to implement.</li> </ul>	<p>Strategy B7 may partially address this concern.</p> <p>The 12 Phase 1 strategies are all targeted to commence implementation by June 30, 2016.</p> <p>Comment noted.</p>
Imagine LA	<ol style="list-style-type: none"> <li>I am concerned with the lack of recommended specific funding for Family and TAY populations; which together make up 1/3 of LA Counties homeless population and are growing at a rapid rate. Shouldn't these populations be receiving a proportional amount of funding? As we know, if we don't deal with these populations, we will keep paying for them in larger amounts in the future.</li> <li>I am thrilled to see us focused on housing. However, I am concerned that policy and funding do not address aftercare services to help the housed thrive -- help their incomes rise, health and utilization of education improve.... Housing is a huge necessary investment and efficient and effective aftercare is needed as insurance to ensure success of that the investment.</li> <li>I would like to see an initiative to further explore how the private sector, individual volunteers and other community actions could get our whole citizenry involved in ending homelessness, chronic poverty and neglect.</li> </ol>	<ol style="list-style-type: none"> <li>Families and TAY are addressed specifically in various strategies, and included in all strategies that provide services to the general population.</li> <li>Aftercare services will be addressed in the implementation planning for the various strategies which involves housing subsidies.</li> <li>Comment noted.</li> </ol>
Inland Valley Hope Partners. Karl Hilgert, Project Leader of the Claremont Homeless Advocacy Program (CHAP)	<p>I filled out a Comment Card at the Community Meeting, but after reading through all the material again, I wanted to add a couple more comments.</p> <p>As the Project Leader of Claremont Homeless Advocacy Program (CHAP) an all-volunteer 3 year old program providing comprehensive service to single homeless adults, I am totally impressed with all the work done on the County of Los Angeles Homeless Initiative.</p> <p>CHAP is now a program of Inland Valley Hope Partners, a 47 year old food, shelter and housing providing program in 12 cities in San Bernardino County and LA County. Together we are now positioned to help bring the necessary services to homeless families and single adults to the far</p>	

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## County of Los Angeles Homeless Initiative Public Comments

	<p>and often-forgotten eastern most corner of LA County.</p> <p>We would like to see a Single Administrative Point of Information where all groups could access in understanding and accessing the funding sources for all the programs Board of Supervisors approves from the Homeless Initiative recommendations.</p> <p>Housing First, Bridge Housing, sheltering and Permanent Supportive Housing are all of interest to homeless singles and families for Inland Valley Hope Partners.</p>	<p>This recommendation will be addressed in the implementation planning process.</p>
<p>Jewish Family Service of Los Angeles</p>	<p>Jewish Family Service of Los Angeles (JFS), established in 1854, serves people of all ages, ethnicities and religions with compassion and caring. JFS serves 100,000 people each year in the greater Los Angeles area. JFS provides food and shelter, connects seniors and people with disabilities to vital resources, and help relatives and friends care for loved ones. JFS counsels families in crisis and provides safe shelter for victims of domestic abuse, helping them create independent lives. The JFS Family Violence Project is a recognized leader in the provision of shelter and supportive services, including counseling, case management, resource and referrals, and advocacy to victims of domestic violence and their children. The goal of JFS Family Violence Project is to empower families to lead violence-free lives and to create an atmosphere of zero tolerance for abuse through community outreach and education. The program includes a Counseling Center, a 24-hour crisis hotline, two 30-day emergency shelters and an 18-month transitional shelter.</p> <p>According to the National Coalition on Domestic Violence, one in every four women will experience domestic violence in her lifetime, and 1.3 million women in America are victims of physical assault by an intimate partner each year. But as prevalent as it may be, domestic violence is one of the most chronically under-reported crimes. And, a recent national census of domestic violence services found that in just one day, over 7,700 requests for services went unmet due to a lack of resources. When the resources do not exist for victims to receive domestic violence services, they are often left with no choice but to risk their own lives by returning to their abusers or become homeless. According to HUD, domestic violence is a significant factor in homelessness. For a majority of homeless women and children, domestic violence is a primary or secondary cause of homelessness.</p> <p>If someone is able to access shelter and services, the result can be like Mary (whose name has been changed to protect her from her abuser), a 23 year-old mother of two, who sought emergency shelter at one of our facilities after her husband attacked her and tried to kill her with a knife. Her husband was prosecuted and sentenced to six months in jail. While, and since, she stayed at our shelter, Mary received counseling, is now working, and is furthering her education to enable her to independently raise her children. Without services, who knows what would have happened to her?</p> <p>Domestic violence affects all of us. Although nearly three-quarters of intimate partner violence victims are female, domestic violence victims are men, as well as same-sex partners. Physical abuse and suffering does not discriminate – it takes place regardless of age, ethnicity, or income level. What’s</p>	<p>Language regarding survivors of Domestic Violence has been added to various strategies.</p>

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## County of Los Angeles Homeless Initiative Public Comments

	<p>more, the impact of domestic violence goes well beyond its direct impact on the victim and the victim’s family. Each of us carries the financial and societal burden of domestic violence. Nationwide, \$4.1 billion each year – more than half the entire budget of the City of Los Angeles – is spent on direct medical care and mental health services stemming from instances of domestic violence. While effective domestic violence programs have saved state and local governments millions of dollars in health care, law enforcement, and other social costs.</p> <p>Therefore, we strongly encourage LA County to modify the draft plan and add critically needed domestic violence shelter and services as a core component to preventing or reducing homeless, in addition to counseling, housing and resources for other people living without permanent housing. Also, the plan should recognize the specialized need for confidential shelter that is unique to these survivors of violence. We hope Los Angeles County will recognize these core issues and add needed resources for the women, men and children who are escaping domestic violence to the comprehensive plan.</p>	
<p>Legal Aid Foundation of Los Angeles</p>	<p>The Legal Aid Foundation of Los Angeles (LAFLA) is the frontline law firm for low-income people in Los Angeles County, with legal expertise in housing, government benefits, domestic violence, land use and civil rights issues. LAFLA submits the following comments concerning the Draft Recommended Strategies to Combat Homelessness as part of the County of Los Angeles Homeless Initiative (“Strategies”). Our comments center on the likely impact that certain proposed changes will immediately have on our clients who reside throughout metro Los Angeles County and for whom the success of Strategies to both prevent and end periods of homelessness will have a profound impact. Our advocates have participated in multiple sessions coordinated through your office to discuss various components of these Strategies. While we plan to provide further comment to the Annual Plan at the public hearing before the Board of Commissioners in February, our written comments focus on following specific strategies outlined in the draft proposals: Homelessness Prevention; Subsidized Housing- specifically benefit programs used in conjunction with housing; Increasing Income; Creating a Coordinated System- especially around decriminalizing homelessness; and Increasing Affordable/ Homeless Housing through land use initiatives.</p> <p>As the County moves forward with designing an integrated system of homelessness prevention resources, we urge it to provide ample opportunity for meaningful stakeholder engagement. Community stakeholders should be involved throughout the development and implementation of any such system.</p> <p><i>Final Observations</i> We are encouraged by County’s willingness to bring resources, energy and innovation to address the complex issues of homelessness and for recognizing the need to include frontline community organizations like LAFLA in these important discussions. We did note, however, the absence of key federal and local partners, such as SSA, VA and the City of Los Angeles at several of the summits and the seeming lack of coordination in planning meetings and hearings that appeared to occur on</p>	<p>Comments noted.</p> <p>The County is committed to maintaining an inclusive and collaborative process during the implementation planning and implementation phases of the various strategies.</p> <p>The County recognizes the need for ongoing funding and is working to identify ongoing revenue solutions.</p>

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## County of Los Angeles Homeless Initiative Public Comments

	<p>parallel tracks at the County and City. This made it difficult for stakeholders to participate in both and to make the important connections between the strategies. We also note that while funding is critical to these Strategies, most of the proposals site the limited \$100 million initially proposed or one-time limited funding sources that are unlikely to deliver or support the long-term solutions required to address some of these systemic problems. As referenced above, the problem of homelessness is so integrally tied to the dearth of quality affordable housing and the challenges that ever-rising housing costs represent. Absent from the proposed strategies is any discussion of creating broader tenant protections such as expanding good-cause eviction protections, rent stabilization or housing quality enforcement to prevent the rampant tenant displacement occurring in many parts of the region.</p> <p>Finally, we commend the County's CEO office for its leadership in the region in bringing together these policy summits in what is, by all accounts, the single most important poverty matter facing the region. We thank you for the invitation to share our thoughts and observations and we look forward to continued discussions and efforts to collaborate on solutions to this critical issue.</p>	
<p>LTSC Community Development Corporation</p>	<p>I briefly scanned the draft documents &amp; noticed that there is no specific strategies for survivors of domestic violence. While the programs and strategies outlined could apply to survivors of domestic violence, there are particularities to their situation that warrant special attention particularly as it relates to being victims of crime, having increased exposure to recurring violence and the specific trauma of their given experience. Also the reality of CES and the assessment tools are not functioning as indicated in the draft reports. The process to match candidates with housing opportunities is labored and excessively protracted with various agencies and providers having different understanding of the process leading to mismatches and delay.</p>	<p>Language regarding survivors of domestic violence has been added to various strategies.</p>
<p>Neighborhood Legal Services of Los Angeles County</p>	<p>Increasing Access to Housing NLSLA Strongly Supports the Following Recommendations to Provide Short-term Housing Subsidies to Various Populations within a Rapid Re-housing Model.</p>	<p>Comment noted.</p>
<p>Neighborhood Legal Services of Los Angeles County</p>	<p>Neighborhood Legal Services of Los Angeles County ("NLSLA") is pleased to take part in the public comment process for the County of Los Angeles Homeless Initiative's Draft Recommended Strategies to Combat Homelessness (the "Draft"). As a legal services organization serving nearly 130,000 low-income people each year, in practice areas ranging from eviction defense, and health and public benefits advocacy, to expungement, domestic violence and immigration advocacy, NLSLA is intimately aware of the myriad causes of homelessness in Los Angeles County. Overall, we commend the drafters for their thoroughness and creativity, and find the Draft to be a significant step in the right direction of ending homelessness in Los Angeles County.</p> <p>Our comments focus on strategies that we believe should be prioritized based on our experience working with homeless clients, and clients at imminent risk of homeless. Some of the strategies our organization believes should be prioritized have been substantially included in the Draft's proposed strategies; some have been included but require some modification; and some have not been incorporated into the Draft at all, much to our concern.</p>	<p>All comments noted. The comments related to individual strategies are addressed in the above portion of this document which addresses comments on each strategy.</p>

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## County of Los Angeles Homeless Initiative Public Comments

	<p>Our comments regarding priority strategies will be divided into two sections: Increasing Access to Shelter and Housing, and Increasing Access to Income. While we provide a detailed outline of all of our comments below, we have five central concerns with the current Draft.</p> <ul style="list-style-type: none"> <li>• First, while we commend the inclusion of a Homelessness Prevention Program for Families (see Priority Strategy A1), we are disappointed that a similar program was not recommended for single adults—especially for vulnerable adult populations such as the disabled and elderly.</li> <li>• Second, we are dismayed that two crucial protections against needless homelessness were omitted from the recommendations: the adoption of a “Good Cause” for Eviction Ordinance for Los Angeles County, and protection to Section 8 tenants from losing their vouchers based on their inability to pay one month’s rent.</li> <li>• Third, rather than replace the current GR to SSI advocacy program with one modeled on B.E.S.T., the County should significantly expand funding to reach more people. The cost-benefit of SSI advocacy is profound. Many chronically homeless people who would qualify for SSI won’t get help if the program is not expanded. A larger investment in SSI advocacy will yield significant savings for the County.</li> <li>• Fourth, the Draft fell short on two essential policy recommendations to remove barriers to employment for formerly incarcerated people: (1) The Draft omitted mention of the expansion of “Ban the Box” legislation to include private employers, and employers with County contracts; and (2) the Draft failed to recommend adequate funding to the Criminal Record Clearing Project.</li> <li>• Finally, the Draft overlooked the special needs of certain high-risk populations, including survivors of domestic violence, the elderly, people living with HIV/AIDS, and the disabled. The special needs of these populations must be carefully considered in every aspect of this effort.</li> </ul> <p><b>OVERVIEW &amp; RECOMMENDATIONS</b></p> <p>I. Increasing Access to Housing:</p> <p>A. NLSLA strongly supports the following recommendations to provide short-term housing subsidies to various populations within a rapid rehousing model:</p> <ol style="list-style-type: none"> <li>1. Partner with Cities to Expand Rapid Re-Housing (B3);</li> <li>2. Expand the General Relief Housing Subsidy and Case Management Project (B5); and</li> <li>3. DCFS Family Reunification Housing Subsidy (B6).</li> </ol> <p>B. NLSLA strongly supports strengthening the Coordinated Entry System (E7), and enhancing the Emergency Shelter System (E8), but believes the Draft should address the needs of vulnerable populations, including DV Victims, the Elderly, People with HIV/AIDS, and the Disabled.</p> <p>C. NLSLA strongly supports strategies to increase affordable housing, particularly through:</p> <ol style="list-style-type: none"> <li>1. the Linkage Fee Nexus Study (F2); and</li> <li>2. the Development of a Second Dwelling Units Pilot Program (F4)</li> </ol>	
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## County of Los Angeles Homeless Initiative Public Comments

	<p>D. NLSLA strongly supports the recommended Homelessness Prevention Program for Families (A1), but believes three vital homelessness-prevention strategies should be include in the recommendations:</p> <ol style="list-style-type: none"> <li>1. The Draft should recommend a Homelessness Prevention Program for single adults;</li> <li>2. The Draft should recommend “Good Cause” Eviction Ordinance for Los Angeles County; and</li> <li>3. The Draft should recommend increased protections for Section 8 tenants at risk of losing their vouchers for non-payment of rent.</li> </ol> <p>E. NLSLA strongly supports increased affordable housing with supportive wraparound services, discussed throughout.</p> <p>II. Increasing Access to Income:</p> <p>A. NLSLA strongly supports the following recommendations to increase access to public benefits:</p> <ol style="list-style-type: none"> <li>1. The strategy to establish a countywide veterans benefit advocacy program to reduce veteran homelessness (C5);</li> <li>2. Strategies to establish SSI advocacy programs for the homeless (C4) and for inmates (C6), and believes such programs are inextricably tied to the enhancement and expansion of subsidized housing for GR recipients (B5); and</li> <li>3. Creating partnerships for effective access and utilization of ACA services by the homeless (E3), and the inclusion of a robust health literacy education program into County efforts.</li> </ol> <p>B. NLSLA strongly supports increasing access to employment for vulnerable populations in the following ways:</p> <ol style="list-style-type: none"> <li>1. NLSLA strongly supports the recommendation to enhance CalWORKs subsidized employment programs for homeless families (C1); and the recommendation to expand targeting, recruitment and hiring processes for homeless individuals to increase access to county jobs (C2);</li> <li>2. NLSLA urges the inclusion of a recommendation to expand “Ban the Box” legislation to include private employers, and employers with County contracts;</li> <li>3. NLSLA strongly supports the recommendation of a Criminal Record Clearing Project (D6), but recommends increased funding to the project; and</li> <li>4. NLSLA recommends funding legal and case management services to undocumented people who are unemployed, underemployed and homeless.</li> </ol>	
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## County of Los Angeles Homeless Initiative Public Comments

<p>Neighborhood Legal Services of Los Angeles County</p>	<p>NLSLA commends the drafters of the County of Los Angeles Homeless Initiative’s Draft Recommended Strategies to Combat Homelessness for the stellar first draft, and thanks them for the opportunity to comment on troublesome omissions. It is only through these continued, coordinated efforts of leadership and action that, together, we will bring an end to the homelessness crisis in Los Angeles County, and the needless suffering of so many.</p>	<p>Comment noted.</p>
<p>Neighborhood Legal Services of Los Angeles County</p>	<p>NLSLA Recommends Funding Legal and Case Management Services to Undocumented People Who Are Unemployed, Underemployed, and Homeless.</p> <p>There are 900,000 undocumented individuals in Los Angeles County, many whom are willing and able to work, but cannot be legally and fully employed due to their lack of immigration status. Many individuals may be eligible for some form of immigration relief, but are not familiar with complicated immigration law and continue to find themselves in a difficult situation of breaking employment laws to be able to work. Some examples of statuses that can be aided through legal or informational/self-help services are: DACA/DAPA, work permits, amnesty, or VISAs.</p> <p>According to a study by the Center for the Study of Immigrant Integration at the University of Southern California, the median age of unauthorized immigrants in California is 31, a prime working age. Full-time unauthorized workers earn \$30,000 less a year on average than native-born ones. In addition, the U.S.-born children of unauthorized immigrants have a tougher time than those born to parents who are here legally. Many do not obtain services or programs for which they are eligible because they fear exposing their parents, and childhood poverty is pervasive. “Their future is our state’s future; when families are stable and able to earn better wages, then their kids can also flourish – in school and in life – in securing our state’s future,” says Manuel Pastor, director of the USC Center for the Study of Immigrant Integration and a co-author of the report.</p> <p>Aiding individuals and families in receiving immigration relief and removing that barrier to employment is an important step in growing the labor force and increasing tax revenues for state and local governments. With legal assistance for a pathway to immigration relief, Los Angeles County is projected to boost the annual income of this population by \$2,573,002,976. This boost in income is likely to be spent and generate more economic growth</p> <p>Los Angeles County would greatly benefit a multidisciplinary approach. County agencies and/or departments could make referrals to community legal services which already have the legal expertise to assist undocumented people in Los Angeles County. With additional funding set aside for the expansion of immigration assistance, more people will be able to get into the work force at a faster rate.</p>	<p>Recommendation noted.</p>
<p>Neighborhood Legal Services of Los Angeles County</p>	<p>NLSLA Urges the Inclusion of a Recommendation to Expand “Ban the Box” Legislation to Include Private Employers, and Employers with County Contracts.</p> <p>Criminal records can be a barrier to employment and thus stable housing. Further, individuals with criminal records are likely to have lower wages, which in turn restricts housing options. In addition, an individual’s criminal record can negatively affect a landlord’s perception of an applicant.</p>	<p>This recommendation could be addressed outside of the Homeless Initiative.</p>

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## County of Los Angeles Homeless Initiative Public Comments

	<p>Furthermore, those with felony records can and have been denied public housing assistance.</p> <p>Many employers have been accused of simply throwing out applications once a prospective employee admits to a criminal past. “Ban the Box” gives people with criminal records an opportunity to be considered for employment based upon their skills and strengths, rather than being judged for a past encounter with the criminal justice system. The policy operates by delaying conviction inquires on initial employment applications until there is a conditional offer of employment, and eliminates background checks unless required by law, or the employer has made a good faith determination that the relevant position is of such sensitivity that a background check is warranted.</p> <p>California Labor Code section 432.9 applies a “Ban the Box” policy to all Public Employers. According to employment law experts and advocates, extending that policy to apply to private employers and government agency contractors in Los Angeles County will promote economic growth by helping to cut unemployment and recidivism among a growing population with criminal records. A number of counties throughout the United States have seen increased hiring and job retention through the use of the “Ban the Box” policy. For example, in Durham County in North Carolina, since 2012, the number of people with criminal records hired by the County nearly tripled. In addition, 96% of Durham County applicants with criminal records, who were recommended for hire prior to the criminal record check, were ultimately hired after record checks revealed some criminal history. Further, none of the people with a criminal record who were hired have been terminated because of illegal conduct. Moreover, the Durham government has improved the employment outcomes of people with criminal records without compromising public safety, as there has not been any increase in workplace crime.</p> <p>The positive employment outcomes of Durham’s Ban the Box campaign is not isolated. The City of Minneapolis removed the question about criminal record history from the initial employment application in 2007. After the policy was implemented, Minneapolis officials reported that the transactional work associated with the hiring process decreased. Moreover, delaying the question about criminal history did not slow the hiring process down, and it resulted in the employment of more than half of the applicants with a criminal conviction. In addition, San Francisco’s Fair Chance Ordinance regulates employers’ and City contractors’ use of arrest and conviction records when making employment decisions regarding individuals who perform, or who will perform, work in San Francisco. Furthermore, Hawaii was the first state to ban the box for both public and private employment applications. The bill prohibits inquiring into an applicant’s criminal history until after a conditional offer of employment has been made, which may be withdrawn if the applicant’s conviction record within the last 10 years, bears a “rational relationship” to the duties and responsibilities related to the position</p> <p>NLSLA urges the inclusion of a recommendation that Los Angeles County expand the “Ban the Box” policy to include private employers, or, at the very least, those employers who contract with or lease from the County, and encourage the cities to do so as well.</p>	
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## County of Los Angeles Homeless Initiative Public Comments

<p>People Assisting The Homeless</p>	<p>PATH would like to acknowledge and commend the County's tremendous effort to develop thoughtful, comprehensive strategies to address homelessness in our communities. We have been part of the homeless services system in Los Angeles for more than three decades, and in the past three years, we have helped more than 5,000 homeless individuals, families, and veterans move into permanent housing. These strategies give us great hope for the possibility of one day achieving the ultimate goal we're dedicated to – ending homelessness.</p> <p>We have been actively involved throughout this planning process, and are thrilled to see the extent to which our suggestions and those of other long-term services and housing providers have been incorporated in the recommended strategies. Though all of the strategies are important and will undoubtedly help address homelessness in some way, of particular note to us are priority areas B (subsidize housing) and D (provide case management and services).</p> <p>Within the Subsidize Housing priority area, we are highly supportive of all strategies, but are particularly excited about areas B3 (partner with cities to expand rapid re-housing) and B8 (Housing Choice Vouchers for permanent supportive housing).</p> <p>Please provide a mechanism to fund services for individuals, who are not linked to, or refuse to engage with, County health or mental health services. To characterize this problem, of the 109 people housed by PATH and our partners through SPA 7 Coordinated Entry and our Gateway Connections program in the last 6 months, only 3 people were able to access DMH or DHS housing resources. The rest were housed through VASH (operated by PATH), general Housing Choice Vouchers (mostly administered by PATH), or through rapid rehousing currently funded through the Gateway Cities initiative. This is something to keep in mind in terms of how ongoing supportive services need to be provided for, and how individuals can access; tenant based supportive housing resources through HACoLA or any other housing authority. We would be happy to discuss further and provide more details in this regard.</p> <p>Finally, we would like to emphasize that this investment on the part of the County can only truly succeed if it is looked at as a long-term commitment. One time funding will not work – it will make a short term difference but, once the funds dry up, we will find ourselves in the same situation we're in today. The system-change elements of these strategies have a better chance for long-term impact, but alone are not enough. As a County, we must recognize the significant, ongoing investment it will take to actually end homelessness in our community – not simply manage it.</p>	<p>Comments noted.</p> <p>The County recognizes the need to for ongoing funding and is working to identify ongoing revenue solutions.</p>
<p>Public</p>	<p>Additional staffing will be needed to implement the recommended strategies; do we have a strategy to increase the workforce to enact these strategies?</p>	<p>There is not a strategy to address staffing specifically, but the potential need for additional staff will be assessed through the implementation planning process for each strategy.</p>

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Public	Although we do not have comprehensive immigration reform, LA County declared itself a sanctuary for immigrants. A large of population of homeless individuals are also undocumented - what services will be created for them to have access to them? Currently they have very minimal services and we cannot create a plan that does not include this marginalized population.	Comment noted.
Public	As the mother of a 45-year old homeless man and having been on committees and signed petitions and contributed to organizations dedicated to helping the homeless, I am shocked at the little that has been done to eliminate homelessness in this country and in particular, Los Angeles and environs including Long Beach CA. I am aware that this is a complicated issue and there are no easy solutions to the problem. However I hope priority will be given to providing workable solutions to any homeless individual in need of the basic needs of food and shelter.	Comment noted.
Public	Ban the Box, expanding this policy to private employers will assist in employment as well as obtaining housing.	This recommendation could be addressed outside of the Homeless Initiative.
Public	Definitely needs a robust reporting back system to monitor implementation issues at the SPA level. My CES work in SPA 8 has me concerned with cities' involvement. There are about 15 cities in the So Bay – how involved will they be? What incentives? Could a “cheat sheet” for easy participation be created for cities? Can we find out which cities are already involved and interested?	We look forward to engaging with cities during a planned Regional Summit for Cities and throughout the implementation planning and implementation of the Homeless Initiative strategies.
Public	Eliminate poverty. Everyone has a good paying job. No more evictions. Mental health is available on a full time basis. Have full time trained mental health professionals available at all stages of life. Starting in grammar school. Stop high rents. Give people a chance to breathe. No more putting people out of their homes even if they can't pay their mortgages. Find a way to assist them. If people have mental problems and want to live outside then find a beautiful large place of land that is well cared for and let them live outside but under beautiful and well cared for conditions. When i say outside I mean with shelter from the weather. People who are truly mentally ill should be forced to take medication and also should be forced into an institution until they can be made well. Otherwise they are unpredictable and disruptive and dangerous. Don't have places that are too large. but moderate sizes with well trained and well paid staff. The city of Austin had a nice model for homelessness. People should not be laying and stumbling around the streets in filth and disease. If this happens then they should be picked up and placed in a wonderful environment that is supportive. If we can have stadiums and hotels we can have all of our citizens healthy. People need jobs. Stop making good jobs hard to get. We have colleges all over the United States that have degrees in mental health. The answers are there. There are an immense number of jobs that can be created in making the homeless whole again. I know not all of them but most of them. People complain about the homeless in their neighborhoods. They are right to complain. Do something about it. It is solvable. Put the money and resources into it.	Comment noted.
Public	First, separate the operations of the Housing Authority from Community Development Commission. Residents cannot locate any services relating to housing or homelessness, at present if you view the	Comment noted.

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## County of Los Angeles Homeless Initiative Public Comments

	CDC site it only has three key menu tabs and they are For Homeowners, For Business and For Developers... Residents need to have a stand-alone agency that is fully focused on Housing Services to the Constituents it serves...first and foremost.	
Public	I had a hard time getting to the live stream. I appreciate the ability for being able to enjoy a livestream. At this time I have not read the draft so I have no comment.	We regret you experienced technical difficulties. The full live stream of the January 13 Community Meeting is available for viewing on the Homeless Initiative website.
Public	<p>I have lived in Highland Park for 35 yrs. in the 1st District. I am in the 14th LA City Council District, close to San Pascual Park and the Arroyo Seco (Zip Code 90042) on the extreme NE edge of the city of LA.</p> <p>My comment:</p> <ol style="list-style-type: none"> <li>1. The plan does little for Highland Park. Too vague, too long term. More homeless every day. Drug paraphernalia, trash, graffiti, vandalism, theft, dirt, disease, aggression, violent crime increasing. I respect the generosity of those who try to help, but not all homeless are harmless.</li> <li>2. We need refugee camps and we need them now. Good models in Turkey. Organized, safe, tents, toilets, showers, education for children, medical care, rules. Sleeping in Arroyo, parks &amp; on sidewalks need no longer be an option.</li> <li>3. Right now, LA City Council does have a plan, although not acknowledged: The City is making clearance of Downtown Skid Row a priority. Wall St Journal writes on opportunities for developers in Downtown LA, many from UK, China, etc., buying land. We pay, they profit. Police have been stricter in Downtown Skid Row than NELA.</li> <li>4. Delay is bad for Highland Park. Homeless are being shunted up the Arroyo Seco towards us, becoming bolder. LA City seems to hope they will end up in Pasadena. City's aims do not align with County's.</li> <li>5. If I were a bigtime drug dealer, I would seize the marketing opportunity offered by chaos in LA City and County. We could end up like New Hampshire or Sinaloa, with hundreds of heroin and opioid deaths, cartel wars, etc. Prop 47 was a mistake (by the voters, I agree).</li> <li>6. Affordable housing does nothing for someone with a drug habit. While LA government was thinking about a plan for a future budget allocation (maybe), I knew personally a homeless person whose marijuana habit reached \$400/mo. before he died. Another drug addict lived in San Pascual Park for 2-1/2 yrs. not 100-ft. from the baseball diamond. Another found dead with needle in arm under San Pascual Av bridge. Another man shot dead this past week in his tent in Sycamore Grove Park.</li> </ol> <p>Meanwhile, I appreciate many of the actions taken by Supervisors Solis, Kuehl, Ridley-Thomas. Thank you.</p>	Comment noted.

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Public	In 2009 there was the Homeless Expo where 400 homeless individual and families were processed and given vouchers, is there future plan to have an event such has the Homeless Expo? Is there a way to have matches within the Los Angeles County Departments?	This recommendation will be considered during the implementation planning process.
Public	Incorporate Public Libraries - they are being used as temporary shelter during the hours they are open, libraries are community hubs, outreach could be very effective there.	Recommendation noted. The Public Library is a collaborator on various strategies.
Public	Interested in helping wherever needed.	We recommend that you contact a homeless services agency in your community for volunteer opportunities.
Public	No one loves YOU more than Jesus! Hermosa Beach - Homeless 5 plus years	No comment.
Public	No sound, stuck on graph!	We regret you experienced technical difficulties. The full live stream of the January 13 Community Meeting is available on the Homeless Initiative website.
Public	Speaker was concerned about sustainability, wanted to ensure that there is a commitment to future funding.	The County recognizes the need for ongoing funding and is working to identify ongoing revenue solutions.
Public	Strategies included for veterans, however let us not forget there are civilian survivors of trauma as well.	Comment noted.
Public	Solar subsidies for homeless. Lots of tax dollars available, low income can receive a 90% tax deduction; homeless people could own their apartment, home, condo or townhouse.	Comment noted.
Public	The concept of Housing First is not new. It is a concept that was developed in the early 80's and has garner success. The importance to implementation must include spelled out guiding principles so that all stakeholders and collaborative partners are on the same page. The principles are : Principles of Housing First are: 1) Move people into housing directly from streets and shelters without preconditions of treatment acceptance or compliance; 2) The provider is obligated to bring robust support services to the housing. These services are predicated on assertive engagement, not coercion; 3) Continued tenancy is not dependent on participation in services; 4) Units targeted to most disabled and vulnerable homeless members of the community; 5) Embraces harm-reduction approach to addictions rather than mandating abstinence. At the same time, the provider must be prepared to support resident commitment to recovery; 6) Residents must have leases and tenant protections under the law.	Comment noted.
Public	The South East WIB and Long Beach WIB resources must be considered a part of this program as Hawaiian Gardens, Lakewood, Long Beach, Paramount, Bellflower, etc. have homelessness too.	The County looks forward to working with all 88 cities across the County, which includes all of the Workforce Investment Boards.

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Public	There are very few shelter resources in SPA's 6, 7 and 8. Being blocked from sending homeless patients to Skid Row where all the case management services and the majority of homeless resources are really reduces our ability to help our patients and to fully meet their needs. We need additional homeless shelters and supportive housing in the above 3 SPA's. In addition, we need more Case Management programs/services and support services in these SPA's, to allow these people the same access to resources that are available to those in the Skid Row area.	Comment noted.
Public	Where is the WIA dollars, where are the federal jobs? The jobs offered by Chrysalis are not sustainable employment, homeless need opportunities for good jobs.	Comment noted.
Public	<p>Fresh off of the livestream on recently drafted Homeless Initiative, I would like to share my story of how with so many drafted policies and heavy media coverage on curing the ever growing population of chronic homelessness, I have had a special circumstance with my children.</p> <p>There are not sick, no developmental disabilities, I have no addictions or substance dependencies and was not a victim of any form of abuse fortunately.</p> <p>With no preconditions of me or my four sons, that was not enough to successfully receive some form of housing placement to secure a stable living environment for my sons, seek their offline education and assume a normalcy each American family is entitled to.</p> <p>Attached is a detailed account of my arrival from Portland, Oregon with my four sons to start a new existence and how it resulted in a year of homelessness resulting in months in Van Nuys at Woodley Park. It's necessary to share the process in resolving the problem. <i>(Note: Attachment is not included in this compilation of public comments.)</i></p>	No comment.
Public	<p>Huh, sad and unfortunate of my fellow homeless brother's / sister's out there, WHOM kindly need more 'care', misc. than me; I AM EASY to assist and help get off the street's and become housed. PLUS, there's (below); huh, come people, please, I'd kindly like to NOT die homeless. I have been trying to network unto local - national human's, homeless (related?) agencies, non-profit's, organization's, misc and ETC across the board. I've been trying to 'reason' kindly with you all for over 5 plus year's, with no thus far housing securement discussion, misc. Sigh, please?</p> <p>I'm kindly asking, if you're offering, for your help, hence, we can do this, let's just try and have a discussion and see how we can make this happen. A nice little studio apt in a decent, safe neighborhood would be nice, and I do have my ie: studio apt size belonging's safely secured in a Hermosa Beach 5' x 9' storage unit;</p> <p>And note, I don't do bed's, what I got is a personally, long time self bought Cot &lt; 7' long x 3' wide x 2' high, my own little TV, 3' high little refrig and small microwave, misc belonging's. I'd need though assistance with move-in cost's and time available to find a an apt and doing the 'move' per driving, misc per a "UHaul" as I do have a driver's license. Thank you kindly and sincerely in advance, God bless and good day</p> <p>No one loves YOU more than Jesus!</p> <p>Re: homelessness, me 5 plus yr's - to date homeless and not why anyone thinks; I DID step / stand</p>	No comment.

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## County of Los Angeles Homeless Initiative Public Comments

	<p>up, voluntarily involved with local residential, community neighborhood improvement per / via my own personal, individual spare time, energy AND \$ money, and where'd that get me: Ruined, blacklisted and retaliated against.</p> <p>There's vast, discussable deal's 'out there to be had' per / via barter and housing in exchange for doing (?). Even walked (as I've done in the past and know the place well) - "Lake Hollywood Reservoir", 3.2 mile walk around; anyway, my point is, I've walked through and down some of those street's throughout Hollywood Hills / 90068, HUH, the neglect and lack of upkeep on some of these home's which (?) spent so much money \$ for. Geez, I'd love to do a 'room', misc housing arrangement in exchange for low rent AND doing work around home, misc. SIGH . . . ya just don't know enough. Wow.</p> <p>Past / Previous Accomplishments / Achievements; Homeless are NOT human financial commodities! Stop demonizing the homeless (generally speaking). Left HUD's Section 8 housing program (8/2004 - 4/30/10), via civil code: 1942.5, besides all the stuff I did via voluntary tenant advocacy &amp; the 'Martin Luther King Jr' thing - on a smaller scale = ruined to homelessness (4/30/10 – current / present), though past voluntary, misc achievement's and misc, though not even any - informed local 'legal' cared, misc to do anything, nothing; ME: tenant advocacy on behalf of (22) plus low income tenant's (some Section 8, some non) – whom, more less, imagined me doing the 'Martin Luther King Jr' thing but on a much, much smaller scale. I've past shown and exhibited - being involved with local community neighborhood, such as sole, self financially and voluntarily exercised physical labor with NO desired 'lime light', NOR financial reimbursement - from anyone. I deemed I, as a residential civilian, had a fellow responsibility to 'step up' and be involved, hence, my choice and of my own free will, thus, safer, clean, misc area. Networking with the normal community neighborhood standard of first point of contact with the local senior lead assigned community neighborhood "L.A.P.D." officer.</p> <p>Then there's (what I was involved with) – As I just got tired of it being too dark, as I know same for other's, even ill potential for night crime, but I covered &amp; voluntarily paid for (7) night time light's ie: additional residential community neighborhood outdoor lighting, via/per a civilian contract with "LADWP"– invoiced / billed \$254 / bi monthly, on various wooden pole's in (8/2004 – mid 2010). Post / after being 'ousted' from residential area, I simply returned local residential community neighborhood area back unto 'The Darkness' for which I found it, misc - (8/2004).</p> <p>Then there's landscape services, (Tree and shrub as well as grass/lawn spray treatment's every 4 - 6/wk's), under \$50/mo I voluntarily covered - unto/atop of the old rental properties front yard landscape (which should have never been an issue, since owner lived off site and I was paying for it voluntarily and self \$ financially).</p> <p>And additionally, I had a separate landscaper sole guy / man come by every (3) month's - (\$80 each</p>	
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## County of Los Angeles Homeless Initiative Public Comments

	<p>time) to do 'weed trimming', while I was behind the landscaper - sweeping and picking up freshly cut / trimmed landscape debris, hence, me - involved.</p> <p>And even then, in the rental building itself, during normal day time hours, periodically say, vacuuming each of the (3) floor's – hallway's, water/rag – wiping down hand rails, cleaning of window's; huh, I should have been a manager, but I'm a loner, sole guy.</p>	
Public	<p>I applaud the outline for appropriating \$101 Million For Homeless folks. It looks good on paper; however, nowhere did I see any mention on acquiring HOMES , since it is common knowledge the rental market has shrunk immensely. Might I be so bold as to suggest creating an entity separate from yourselves, to purchase and oversee former foreclosed homes and apartments for low income, homeless/ at risk to be homeless, and ? This has a double benefit; as it would potentially reduce crime by not having as many abandoned homes for gang members, drug dealers crack houses, cat houses and other undesirables moving into.</p> <p>Maybe what I have said only shines on paper; as I am not familiar with everything there is to know about helping folks from being on the streets. Then again, maybe you can Polish it up and make it shine for all of us. I truly hope you will help make it so. (In a perfect world, etc...)</p>	Recommendation noted.
Public	<p>I hope that in your planning you are taking into consideration the migration of more homeless into the LA area as word gets out that you are providing the necessities.</p> <p>I would imagine the migration would be about what you have seen in the increase of homelessness each year.</p>	Comment noted; however, the 2015 Homeless Count showed that people experiencing homelessness in Los Angeles County are no more likely than other County residents to have migrated to the County.
Public	<p>LA - pumping out 13,000 new homeless a week! No one loves YOU more than Jesus! Hermosa Beach - Homeless 5 plus yrs THEY (power?) &lt; NOT! THEY wouldn't know power if it starred THEM in the face (GOD / Jesus / Heaven), and I wouldn't be surprised if it (GOD / Jesus / Heaven) hasn't, THEY just wouldn't know it! The DAY is COMING! THEY ain't done NOTHING in 20 year's / 2 decade's, Local - National! HUD is CORRUPT!</p> <p>I'm just a LA local laborer, whom previously 5 – 6 year's ago had what I thought was a down to earth, simple, easy, clean, normal residential home life (before realizing a) just whom I was doing rental business with (local corrupt housing authority and further more, HUD as a Whole), and b) just what I was involved with ie: badly, corrupt run non-human HUD Section 8 housing program); Please stop the stigmatization of us homeless out there HUD's leadership? UGH!</p> <p>Federal embezzlement of given annual fund's by congress to budget and properly disperse downward throughout HUD and down unto local level; INSTEAD, – those \$\$\$, unto friends/family, thus, NO federal prosecution, NO federal imprisonment</p>	No Comment.

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## County of Los Angeles Homeless Initiative Public Comments

	<p>and NO federal restitution &lt; (\$ payback) NOTHING! But (a slap on hand?) and sent into shadows, misc. I mean, what's that say about Congress as a Whole?!?</p> <p>Thus, same B/S just goes on and on.</p> <p>Take your pick, re: (local?) corruption, for which even FBI has had to be called in to (babysit?) do their thing with these foul asses amidst us in public office.</p> <p>But take your pick, re: (local?) corruption – LAHD (LA Housing Dept), LADBS (LA Building and Safety), LA Environment Health (=) code violations (enforcement? - ain't that a HOOT) agencies – (kiss up?), misc re: \$ slumlord's, while they (slumlord's) still laugh it up all the way to the bank, punking down tenant's, even amidst small claim's court's, as if to say: "Who you think a Black robe is gonna believe, YOU tenant or I? HUH!"</p> <p>And there's also pathetic, misc local housing authority's inspection dept (before a tenant can move in), but more so the owner's dept thereof amidst a housing authority.</p> <p>And why? Because NO system thereof has been set up ie: a blacklist – locally unto federal level, being a slumlord or them trying to trick system by having a family member apply, you know, all the B/S game's thereof they play, ugh!</p> <p>And I know thereof, misc: "Guide to Residential Tenants' and Landlords' Rights and Responsibilities": <a href="http://www.dca.ca.gov/publications/landlordbook/catenant.pdf">http://www.dca.ca.gov/publications/landlordbook/catenant.pdf</a></p> <p>\$ slumlord's still laughing it up all the way to the bank and allowed to keep getting monthly share of \$ per / via local housing authority, per / via local HUD office (downtown LA on 6th, AT&amp;T building, hence, misc from HUD D.C., which annually comes from Congress).</p> <p>Then there's the various throughout LA County corrupt housing authorities, NOT just HACLA on Wilshire, but also Hawthorne – past busted, and misc other's.</p> <p>Word being: Section 8 housing program voucher's = frozen v.s. while other's apparently seem to be getting them (ie: from ? thereof locally unto individual's).</p> <p>And then there's fool's coming outta prison – to local jail's OR from local jail's alone UNTO getting a voucher, side tracking / before those on 8 – 10 year or MORE waiting list.</p> <p>Instead of these fool's being shown / pointed unto homeless shelter's, misc to begin anew and start again.</p> <p>So yeah, I've witnessed – seen / heard it all = loosely said. Even with, separately Today's Roman Soldier's (ie: 5-0, cops, police) though they no pack sword's anymore. THINK I'm B/S-ing, think again!</p> <p>I just never GOT – who I was really doing business with (as I minimally care enough to admit that I have a deep, keen, misc respect for business itself), nor just what I was involved with, thus, with my back up against wall;</p> <p>Ok, sure, I made a choice to walk away, give up voucher, regardless of paying 30 percent of my monthly income – apt rent: \$253 example.</p> <p>AGAIN, I have a deep, keen, misc respect for business itself, PERIOD. We (???) either do it right (in writing, legal bound, notarized) OR we NO do nothing at all, period! That make me a dam fool, ETC under the sun? Huh, in Jesus name, I think NOT!</p> <p>I should be homeless (even as some odd job clientele of mine have shared with me).</p>	
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## County of Los Angeles Homeless Initiative Public Comments

	My back was up against the wall, so to speak, knew sort of that per / via some small claims court, what? THEY slumlord's against a tenant, huh.	
Public	<p>The homeless population that has taken up residence under the 405 Freeway at Nordhoff Street in North Hills is a blight and a danger to the community. These squatters are spread out all over the sidewalk on both sides of the street and at the freeway off ramp--all of this just a few blocks from Monroe High School. These vagrants are blocking the sidewalk with their stolen grocery carts. This encampment is a safety issue for students attending the high school who must walk past this encampment on their way to and from school. There is all kinds of trash, discarded food, and probably even human excrement both on the sidewalk and around the encampment, making this entire mess a health hazard, an eyesore, and a magnet for rodents and other creatures.</p> <p>People entering and exiting the 405 Fwy. at Nordhoff are accosted by panhandlers soliciting money and then must drive past this disgusting mess. The people who live in the homes and communities that are west of the freeway take pride in their homes and neighborhoods, and should not be forced to put up with this disgusting situation which is compromising property values and causing health and safety issues. I strongly request that someone from the county comes to the 405 Fwy under-pass at Nordhoff to see the problem we are dealing with firsthand. I also request a response to this email.</p>	Your concern has been shared with the Los Angeles Homeless Services Authority which maintains a team of countywide homeless outreach workers.
Public Counsel	Our collective success in addressing the homeless epidemic in Los Angeles County requires a long-term commitment. We applaud the County for taking this step and thank you for your leadership in developing the County Plan. However, we also insist that there be continued dedication of time and financial resources to sustain and build upon this effort.	<p>All of the County departments involved in the development of the recommended strategies will dedicate the time necessary to successfully implement the approved strategies, in collaboration with cities and community partners.</p> <p>The County recognizes the need for ongoing resources and is working to identify ongoing revenue solutions.</p>

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## County of Los Angeles Homeless Initiative Public Comments

	<p>almost 20% of the total homeless population. Even though HUD’s definition of DV expanded in 2015, these figures remain staggering. It is unfortunate that the only mention of DV victims in the County Plan is in Strategy E4 which includes them in a laundry list of individuals who would benefit from transforming emergency shelters and transitional housing into interim/bridge housing. Certainly, the needs of those experiencing domestic violence must be considered in each of the strategies.</p> <ul style="list-style-type: none"> <li>• People Living with HIV/AIDS (PLWHA): Similarly, the number of PLWHA significantly increased from 2013 to 2015 (from 349 to 757, an increase of 117%). However, there is no mention of this population in the County Report except in Strategy D3, which references HOPWA’s guidelines as a resource to establish a definition of supportive services. Numerous reports have documented the importance of housing to the health of PLWHA. Given the availability of HOPWA and Ryan White funding to address the housing and health needs of this population, it should not be difficult to integrate this into the County Plan.</li> <li>• Undocumented individuals: Various reports estimate that 14-18% of the total homeless adult population is undocumented. If this statistic is true, many of the strategies for housing, treatment and benefits will not be available for a large segment of individuals experiencing homelessness because they are funded by Medi-Cal, SSI and other federal programs – programs that are not available to undocumented individuals. Therefore, we insist that the County develop additional funding sources to ensure that undocumented individuals experiencing homelessness benefit from these strategies.</li> <li>• Sex Offenders: Often we are contacted by individuals or service providers who are attempting to locate housing for sex offenders required to register under Megan’s Law. To facilitate offenders’ compliance with applicable law, including restrictions regarding living near schools or parks, the County Plan should include housing solutions that would be appropriate for members of this population experiencing homelessness.</li> </ul> <p>4. Strategies diffuse responsibility among agencies and personnel without a clear management structure: Many strategies direct collaboration among various agencies but fail to identify who has primary responsibility for ensuring that the work is undertaken. For example, the relationship among the “case manager” in Strategies D2 and D5, the “Regional Integrated Re-entry Networks” in Strategy D4, and the person primarily responsible for jail discharge planning is unclear. A clear, cross-agency structure should be developed so that consistent case management is offered to people experiencing homelessness as they move through the system.</p>	<p>All subpopulations may be served as part of the greater population categories; however, various strategies were modified to include language on older adults and victims of domestic violence.</p> <p>This comment will be addressed during the implementation planning process.</p>
Public Counsel	<p>We applaud the County for recognizing that land use planning and policy plays a crucial role in addressing our homelessness crisis. We also appreciate the commitment to leveraging the knowledge and experience of service providers, community-based organizations, and stakeholders in the development of these strategies. The rate of homelessness in the County is staggering. Yet, thousands more are on the verge of homelessness – severely rent burdened or living in overcrowded conditions as a result of rising rents and an enormous shortage of affordable housing. Increasing and</p>	<p>Comment noted.</p>

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## County of Los Angeles Homeless Initiative Public Comments

	preserving affordable and homeless housing is imperative, both as a response and a preventative measure. We look forward to working with the County to strengthen and effectively implement these strategies.	
Public	<ol style="list-style-type: none"> <li>1. Being homeless, I committed crime. I also needed the jail to stay dry and rest. If I go to the shelter, I have to get up at 7am, but not in the jail.</li> <li>2. Need oversight and accountability.</li> <li>3. Want more people with lived experience to be involved.</li> </ol>	<ol style="list-style-type: none"> <li>1. Strategy E8 recommends that shelters remain open 24 hours/day.</li> <li>2. Strategy E17 and regular reports to the Board of Supervisors may address your concern regarding oversight and accountability.</li> <li>3. This comment will be addressed during the implementation planning process.</li> </ol>
Public	Hire more peer support to help out the clinicians. Look at how different culture handles homelessness.	Recommendation noted.
Public	I am a mental health worker. There is not enough of us. I am from the Melrose/Western area.	Comment noted.
Public	I am a professor. I am working with investors to buy properties. Work with business and bank communities.	Recommendation noted.
Public	I have lived experience and mental health diagnosis of being chronically homeless. Hard for women without children to get housed. They go from a shelter to another.	Comment noted.
Public	Regarding integration of health services into one agency: Will there be integration of funding from feds, state, county and city?	The three departments which comprise the Health Agency will continue to receive an array of State and Federal funding streams; however, the Agency will pursue ways to integrate various funding streams as effectively as possible.
Public	<ol style="list-style-type: none"> <li>1. What effort is being made to work with the homeless people to find solutions?</li> <li>2. Regarding rate of subsidy: What incentive does the homeless have if they get more subsidy (\$) being unsheltered?</li> </ol>	<ol style="list-style-type: none"> <li>1. This question will be addressed during the implementation planning process.</li> <li>2. There is no financial advantage to being unsheltered.</li> </ol>
Public	What is DPSS' definition of homelessness?	DPSS administers the CalWORKs program and uses a broader definition of homelessness than

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## County of Los Angeles Homeless Initiative Public Comments

		the U.S. Department of Housing and Urban Development. Specifically, the DPSS definition includes people temporarily staying with family or friends, but who do not have a fixed residence.
Public	Where in LA County is the affordable housing? What is considered affordable housing?	The official definition is based on the ratio between rent and median income. Increasing the supply of affordable housing is an element of the Homeless Initiative strategies.
United Way of Greater LA	<p>Overall, this is a fantastic set of ideas, and I would love to see these things funded on an ongoing basis. I appreciate the challenges in reprioritizing budgets and creating dedicated revenue sources, but I do trust there is a way.</p> <p>Another overall suggestion: package a set of these efforts all together so they can be passed as one cohesive set toward a specific outcome.</p> <p>For instance, if you combine recommendations for: Outreach + Bridge Housing + Case Managers + RRH + HACoLA turnover = 2,000 placements of highly acute persons, youth, and households.</p>	<p>The County recognizes the need for ongoing resources, and is working to identify ongoing revenue solutions.</p> <p>All of the recommended strategies will be considered together by the Board of Supervisors on February 9, 2016.</p>
WLCAC & SPA 6 Homeless Coalition	<p>As a homeless service provider for the past 20 years in Skid Row and South LA, I have been blessed to help house 100s of people moving from the streets. It is the healthiest, cheapest and most transformative thing you can do for someone who is homeless. Although it is easy to want quick results by building more shelters, storage, etc, these are only Band-Aids and do not address the issue.</p> <p>This time around, we need to invest as much as we can in the longer term SOLUTION of creating more affordable, permanent housing.</p> <p>We do not want to been in this situation 10 years from now!</p> <p>The following are a list of reasons, created by United Way, why this investment in permanent solutions is the answer:</p> <ol style="list-style-type: none"> <li>1. Shelter is More Expensive than PSH: The CAO report points out that the annual cost of shelter is actually more than the annual cost of PSH (\$18,250 vs. \$15,000).</li> <li>2. Traditional Shelter &amp; Policing are Inadequate Solutions: Only about a quarter of the people in encampments will come inside even with the offer of shelter. Arresting and jailing people for being homeless only snowballs and pushes this problem forward to the next generation. We need to equip outreach workers with permanent housing and alternative bridge housing options.</li> <li>3. You can use existing rentals for PSH: Contrary to popular belief, you do not have to wait years to</li> </ol>	All comments noted.

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## County of Los Angeles Homeless Initiative Public Comments

	<p>create new PSH. You can use rental vouchers today as we build units for tomorrow. This plan proposes both forms. There's also RRH.</p> <p>4.Immediate Actions Should be Linked to Long-Term Outcomes: We absolutely want people to come inside during El Nino and this Winter, but we want them to come in for a lifetime, not just a season. Shelters, Showers, Storage, are all important but should be used in a way that links them to the Coordinated Entry System and to permanent housing opportunities.</p> <p>5. New York Shows the Inadequacy of Sheltering All: In New York, there is a right to shelter and years later, the costs have become unmanageable and their rates of homelessness are higher than ever. As such, the Mayor to just announce a multi-billion dollar permanent supportive housing focused strategy.</p> <p>The SPA 6 Homeless Coalition commends you for your dedication and commitment to our homeless citizens. And we look forward to working with you to help end homelessness in our great county</p>	
Public	Although we do not have comprehensive immigration reform, LA County declared itself a sanctuary for immigrants. A large of population of homeless individuals are also undocumented what services will be created for them to have access to them? Currently they have very minimal services and we cannot create a plan that does not include this marginalized population.	Comment noted.
Public	Immigration relief, an undocumented worker earns \$30,000 less than a documented worker.	Comment noted.
Public	Regarding data that 70% are unsheltered: does it include the undocumented people?	Yes, undocumented residents are included in the homeless count.
Public	Consider working with faith-based organizations. Also consider victims of sex trafficking.	Recommendation noted.
Public	Need something that unites the people with the availability, and also includes an accountability factor, which is 211, not a County entity, which means it can be impartial.	Recommendation noted.
Public	<p>It is really important that you address homelessness and I am so glad you are taking steps to do just that. However, a very significant part of the Los Angeles homeless population is comprised of domestic violence victims and their families. Their only alternative to living in a violent home is to leave and often that puts them out on the street. The City of LA homeless count includes more than 5,000 such victims or 21% of the total.</p> <p>No single solution can address all homeless populations. They all need a home, but domestic violence victims need it to be safe, secure and confidential so that they will not be found by their abusers. Emergency shelters and transitional housing provided by domestic violence agency insure that victims are safe and secure.</p> <p>And yet, the Los Angeles Homeless Services Authority has made deep cuts to domestic violence shelter programs and transitional housing in the Los Angeles Continuum of Care application for federal funds. More than 150 beds are threatened by these cuts. beds that victims desperately need.</p> <p>If your efforts are to help eradicate homelessness we need you to fill the void that the \$671,000 cut to</p>	Comment noted.

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	domestic violence shelters and transitional housing created. Funding for domestic violence has always been inadequate, but this would be a beginning. With those funds restored we could continue to provide a safe and secure place where victims could get the services they need to start over and build healthy lives for themselves and their children. This not only helps the victims of today, but helps insure that there will be fewer victims tomorrow.	
Public	Establish a countywide Domestic Violence Advocacy Program for people experiencing homelessness as a result of Domestic Violence. Provide secure/confidential protocols for keeping them safe and hidden from their attackers.	This recommendation will be addressed during the implementation planning process.
Public	I am urging a request to include domestic violence survivors in the homeless initiative. As it stands, there is no mention of the dv population in any of the strategies. The safety and confidentiality concerns are not taken into account for this population that comprises a number of the homeless population. It would be greatly remiss to exclude this population and will actually be putting many back on the streets.	All subpopulations may be served as part of the greater population categories; additionally, various strategies were modified to address the service needs of victims of domestic violence.
Public	The County plan doesn't take into account the safety and confidentiality needs of Domestic violence victims. If they leave the homes where they are unsafe, where can they go and how can their needs be better addressed.	Various strategies were modified to address the service needs of victims of domestic violence.
Public	Where are the strategies for helping Domestic violence women and their children who are homeless? HUD estimates that one third of all homeless victims are homeless due to domestic violence.	Various strategies were modified to address the service needs of victims of domestic violence.
Public	While I understand that the needs of the homeless are great and there is only so much money to go around, not having a strategy for homeless victims of domestic violence is short sighted. This vulnerable population deserves a chance to break free from the cycle of violence when they have the courage to leave their abuser. Please provide the services they need.	Various strategies were modified to address the service needs of victims of domestic violence.
1736 Family Crisis Center	The Homeless Initiative is noble in order to address the issue of homelessness in the county. However, the draft recommendation is shortsighted with regard to the protection needs of homeless domestic violence victims, homeless human trafficking victims (both adults and children), and homeless children of all ages, including teenagers. These vulnerable, often-silent contingents conservatively represent an estimated 70% or more of the overall homeless population. The plan does not take into account best practices measures and California legal statutes that are and that that have been in place for some time for these sensitive populations that require protection, confidentiality, extreme professional care tailored to the population-specific needs, and highly sophisticated case management and planning . It also fails to address the primary crisis, emergency, and transitional needs for these particular children and adults, and increases the risk of severe injury infliction, perpetrator and gang member contacts, law enforcement emergency calls, and deaths. The preliminary plan on the table for the County, by way of its one-size-fits-all approach, does not yet acknowledge the unique barriers to housing faced by families and individuals fleeing	Various strategies were modified to address the service needs of victims of domestic violence.

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## County of Los Angeles Homeless Initiative Public Comments

	<p>domestic violence, human trafficking, and children and lacks recommendations pertaining to housing and service interventions which will meet their needs.</p> <p>The rapid-rehousing methodology recommended, it seems, fares well for many homeless, but not for children, DV victims, and human trafficking victims. The statistics show that these individuals do not readily stand up to be counted, however we cannot ignore them, and their protection needs, in a local plan.</p> <p>Below are professional provider recommendations to address the needs of homeless domestic violence victims, human trafficking victims (children and adults) and homeless youth in the strategy. As these matters are complex, especially with regard to the safety provisions required and to legal compliance in service plans, the management and staff of 1736 Family Crisis Center (including our lawyers and licenced clinicians) are available to hash out these issues further and assist to develop more appropriate language for the local response strategies.</p>	
Public	<p>As you undertake the critical task of addressing homelessness in Los Angeles County, I urge you to include survivors of domestic violence in this strategy. Many residents of Los Angeles, primarily women and children, find themselves without housing as a result of fleeing violent living arrangements. This segment of the homeless population must be included in any comprehensive plan to alleviate the overall crisis.</p> <p>Based on the 2015 Homeless Count, 21% of the City of Los Angeles' homeless population (5,458 out of 25,686) has experienced domestic violence. The numbers for the County of Los Angeles are likely to be even more significant. For many domestic violence survivors, homelessness is a direct consequence of seeking refuge from an abusive household. Most live well below the poverty line and lack safe housing options elsewhere. These families deserve better choices than staying in a violent household or living on the streets.</p> <p>As you may be aware, the Los Angeles Homeless Services Authority has made deep cuts to domestic violence shelter programs and transitional housing in the Los Angeles Continuum of Care application for federal funds. As part of its homelessness initiative, the County of Los Angeles urgently needs to "back fill" the funding cut of nearly \$671,000 to domestic violence shelters and transitional housing. These programs are widely recognized as effective for survivors of domestic violence, most of whom only require a safe place to rebuild their lives and get back on their feet. Funding has never been adequate for domestic violence services. In light of these federal cuts, additional County resources are needed now more than ever.</p>	Various strategies were modified to address the service needs of victims of domestic violence.
Center for the Pacific Asian Family	<p>It is commendable that the County has developed a plan to address homelessness in the County. However, it is sad and misguided that not a single one of the 50 strategies outlined in the Homeless Initiative addresses a large segment of the homeless population – those who are homeless as a result of domestic violence. As HUD has said for years, about a third of the people on the streets are homeless as a result of domestic violence. This means that tens of thousands of the people who are</p>	Various strategies were to address the service needs of victims of domestic violence.

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## County of Los Angeles Homeless Initiative Public Comments

	<p>homeless in LA County are families fleeing abusive homes.</p> <p>Homeless DV victims require more than housing to end the cycle of violence and bring them to safe and stable lives. A one-size-fits-all solution, such as the Rapid Rehousing and Housing First concepts which are the basis of the proposed County plan, will not work for DV victims because they do not take in the special safety and confidentiality needs of this group. Even if we are able to place domestic violence victims into housing, once the Batterer finds them again—and Batterers have become increasingly more savvy and persistent in finding their victims—these families will not be safe, with the most likely result of their returning to the streets.</p> <p>Additionally, even if we were able to locate safe, confidential locations in which to house DV victims, without necessary wrap-around support services to address the years of abuse they have experienced, it is unlikely that DV victims will heal from their trauma enough to maintain stable, violence-free lives with their children. Most victims experience depression, low self-esteem, the inability to make good decisions, and financial instability. Without help to heal from their psychological wounds (as well as their physical injuries), assistance in improving their financial situation, and linkages to community resources, domestic violence victims will not thrive just because they have four walls and a roof above them.</p>	
Public	<p>Many residents of Los Angeles, primarily women and children, find themselves without housing because they are fleeing violent living arrangements. As you address homelessness in Los Angeles County, I urge you to include survivors of domestic violence in this strategy. This segment of the homeless population must be included in any comprehensive plan to alleviate the overall crisis.</p> <p>Based on the 2015 Homeless Count, 21% of the City of Los Angeles homeless population (5,458 out of 25,686) has experienced domestic violence. The numbers for the County of Los Angeles are likely to be even more significant. For many domestic violence survivors, homelessness is a direct consequence of seeking refuge from an abusive household. Most live well below the poverty line and lack safe housing options elsewhere. These families deserve better choices than staying in a violent household or living on the streets.</p> <p>As you may be aware, the Los Angeles Homeless Services Authority has made deep cuts to domestic violence shelter programs and transitional housing in the Los Angeles Continuum of Care application for federal funds. As part of its homelessness initiative, the County of Los Angeles urgently needs to back fill the funding cut of nearly \$671,000 to domestic violence shelters and transitional housing. These programs are widely recognized as effective for survivors of domestic violence, most of whom only require a safe place to rebuild their lives and get back on their feet. Funding has never been adequate for domestic violence services. In light of these federal cuts, additional County resources are needed now more than ever.</p>	Various strategies were modified to address the service needs of victims of domestic violence.
House of Ruth, Inc. Claremont	I am concerned that the plan does not even once mention domestic violence survivors and their needs, even though they are specifically mentioned in the definitions. People who have survived	Various strategies were modified to address the service needs of

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	<p>domestic violence are much like veterans and suffer some of the same difficulties, like PTSD. The effects of being tortured by the person who is supposed to love you do not resolve themselves easily and many victims do not feel secure living alone for months, maybe years after the events. Transitional housing is one of the most appropriate interventions for them.</p>	victims of domestic violence.
<p>Legal Aid Foundation of Los Angeles</p>	<p><i>Domestic Violence Impacts on homelessness</i>            We respectfully call your attention to the absence of consideration afforded the impact domestic violence has upon homelessness, when we know that approximately 50% of all women who are homeless report that domestic violence was the immediate cause of their homelessness.(National Center for Family Homelessness, 2013). We anticipate that domestic violence survivors will fall through the cracks, and either remain homeless or be forced to return to abusive situations if their specific needs are not addressed in the County's Initiative. Without addressing the impact of domestic violence in causing homelessness and as a barrier to housing, the County's Initiative will fail to address of needs of at least 21% of the homeless population. (LASHA, 2015 Homeless Count). The correlation between homelessness and domestic violence has been reported to be as high at 92% (Browne, A, "Responding to the Needs of Low Income and Homeless Women Who are Survivors of Family Violence," Journal of American Medical Women's Association, 53(2) 57-64.) Although the 2015 HUD "Family Options Study" found a permanent housing subsidy to be the most effective intervention to address homelessness, that study admits that it failed to include domestic violence shelters and survivors in its research. "The study team would expect that these requirements [referring to the fact that some emergency shelters did not accept victims of domestic violence] led to lower numbers of families facing domestic violence at baseline than otherwise might have been the case." HUD Family Options Study at p. 6). As such, we expect that the recommendations offered by the Family Options Study to be insufficient to address the needs of domestic violence survivors who were left out of the study. With the loss of 2000 transitional housing beds in Los Angeles County, domestic violence survivors will be hard hit. With emergency refuges offering 30 day stays, domestic violence survivors have a small window to time to get medical treatment for themselves and their children, obtain restraining orders, apply for divorces or custody orders, divert mail, enroll their children in new schools and retrieve birth certificates and immunization records to do so, get children enrolled in therapy and counseling, get themselves enrolled in therapy and counseling ,arrange police standbys to retrieve personal belongings from their home, find transportation, apply for welfare benefits, apply for crime victim's compensation funds, seek employment, check their credit. Survivors who don't accomplish all these responsibilities within 30 days are unready to utilize a Section 8 voucher, which they will lose if not put into use within 60 days. Without transitional beds, these survivors will have no place to go but to try to find another emergency refuge or back to the abuser.</p>	<p>Various strategies were modified to address the service needs of victims of domestic violence.</p>
<p>Little Tokyo Service Center</p>	<p>I urge you to consider all of the Domestic Violence survivors currently in homeless housing and those who are seeking to escape their abusers. Not only are their needs unique, but they are not homeless by choice and require very specific services. Please reconsider including the urgent needs of Domestic Violence survivors in your Homeless Initiative.</p>	<p>Various strategies were modified to address the service needs of victims of domestic violence.</p>
<p>Little Tokyo</p>	<p>I would like to add that it is concerning that there is no special category for survivors of domestic</p>	<p>Various strategies were modified</p>

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Service Center	violence who are homeless and transgender individuals (particularly transgender women) who are homeless and often struggle getting services because of added barriers around IDs, etc. that show the "correct" gender. It should just be based off of how people self-identify. Or more funding to create a safe housing for transgender people permanent supportive housing.	to address the service needs of victims of domestic violence.
Little Tokyo Service Center	There is no strategy for DV (domestic violence) survivors that are homeless and because of their situation; they have some certain needs that need to be addressed in order to keep them safe for their partners.	Various strategies were modified to address the service needs of victims of domestic violence.
Los Angeles Mission	Domestic Violence and Family Safety Absent in these initiatives is a clear direction to address the unique housing, programs and safety needs for this community. The County should create a taskforce and focus group similar to the homeless focus group convened for these initiatives around this issue to appropriately provide housing, education, parenting and other applicable aspects of recovering from the trauma of domestic violence.	Various strategies were modified to address the service needs of victims of domestic violence.
LTSC Community Development Corporation	I am urging a request to include domestic violence survivors in the homeless initiative. As it stands, there is no mention of the dv population in any of the strategies. The safety and confidentiality concerns are not taken into account for this population that comprises a number of the homeless population. It would be greatly remiss to exclude this population and will actually be putting many back on the streets.	Various strategies were modified to address the service needs of victims of domestic violence.
LTSC Community Development Corporation	<p>According to the 2015 Greater Los Angeles Homeless Count results (by Los Angeles Homeless Services Authority), domestic violence is the fourth most prevalent characteristic of the homeless in LA County (21%). In SPA 4 (where LTSC Community Development Corp. is providing services), domestic violence is the 5th (17%) characteristic.</p> <p>In this Homeless Initiative, there is no mention of any strategy to deal with people who are fleeing an abusive relationship. Without shelter services, both emergency and transitional shelters, domestic violence victims have the heartbreaking choice of staying with the abusers or becoming homeless.</p> <p>The Domestic Violence Counts 2014 survey conducted by the National Network to End Domestic Violence, found during a 24-hour period there were 1650 people served in shelter and 1314 people served in transitional housing in the State of California. There is a great need for shelter services to domestic violence victims.</p> <p>LTSC provides a transitional housing program for domestic violence survivors, especially immigrant populations. Shelter provides a safe place for domestic violence survivors to heal from the trauma they have experienced from their abusive relationship. Our survivors learn new skills and eventually move to permanent housing to live an independent violence-free life.</p> <p>I strongly urge that shelter services for domestic violence survivors be included in the homeless initiative. Thank you.</p>	Various strategies were modified to address the service needs of victims of domestic violence.

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<p>Neighborhood Legal Services of Los Angeles County</p>	<p>The Draft Should Address the Special Needs of Vulnerable Populations, including DV Victims, the Elderly, People with HIV/AIDS, and the Disabled.</p> <p>a. DV Survivors Have Special Needs That Must Be Addressed</p> <ul style="list-style-type: none"> <li>• DV Survivors are disproportionately at risk of ending up homeless. According to the National Coalition for the Homeless, 28% of families were homeless as a direct result of domestic violence as of 2008. Even more striking, “Approximately 63% of homeless women have experienced domestic violence in their adult lives,” highlighting the pervasive and destructive role of domestic violence in perpetuating homelessness among women</li> <li>• It bears emphasis that DV survivors have experienced trauma that renders them emotionally, financially, or physically vulnerable and fragile, and need efforts to accommodate their unique needs throughout these plans. Accordingly, appropriate and safe housing options should be prioritized for DV survivors, given that they are often fleeing life-threatening acts of violence. Clients regularly express to NLSLA attorneys how important it is to feel that they have someone to trust and confide in – given our duty of confidentiality – and what a significant emotional and psychological burden we helped alleviate by letting these traumatized women know we will stand with them and protect them against further sexual assaults and abuse.</li> <li>• Potential Strategy 7.2, the predecessor to Draft Recommendation Strategy E8, addressed these concerns, and cited the National Alliance to End Homelessness study to emphasize the need for “special accommodations” to prevent discrimination against vulnerable populations, such as victims of domestic violence. Despite this, Strategy E8, and the Draft as a whole, neglects the special needs of homeless DV survivors, except to say that they should be accommodated in a general sense in shelters. This general statement is inadequate. NLSLA suggests that a revised Draft include recommendations that are sensitive to DV survivors, for example by offering specialized shelter spaces and prioritizing DV survivors in the utilization of other resources such as Eviction Prevention, long term housing, or housing subsidies. Additionally, NLSLA recommends funding Family Solution Centers and other providers to offer confidential spaces for interviews, waiting rooms and other spaces to ensure the safety of DV survivors. Indeed, the County should take a similar, individually tailored approach with respect to all other traumatized and vulnerable population.</li> </ul> <p>b. The Elderly, Disabled, and People with HIV/AIDS Have Special Needs that Must Be Addressed</p> <ul style="list-style-type: none"> <li>• The Draft must more meaningfully address the unique needs of special-needs populations. When considering groups such as the elderly, disabled or people living with HIV/AIDS, it must be understood that they have qualitatively different needs than other homeless individuals. For example, AIDS victims have unique health needs; the disabled may have mobility issues that make a housing search, or a stay in a shelter, impossible; and senior citizens are particularly frail and oftentimes have more health complications stemming from</li> </ul>	<p>All subpopulations may be served as part of the broader population categories; however, various strategies were modified to include language on older adults and victims of domestic violence.</p>
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## County of Los Angeles Homeless Initiative Public Comments

	being homeless. These subgroups of the homeless or at-risk populations have diverse needs that require dexterous strategies that should be carefully considered.	
Peace Over Violence	Domestic Violence is a leading cause of homelessness for women and their children. Many victims face homelessness when they flee abusive homes. Their experiences are confounded by economic instability, often perpetuated by abusers. Policy makers must work to ensure that safe, affordable housing is available to victims and must reduce the barriers victims face in securing and maintaining housing.	Recommendation noted.
Peace Over Violence	The current strategies proposed for preventing and responding to homelessness completely miss the mark on the reasons for homelessness and the risks of homelessness--particularly for women and children: domestic violence and sexual assault. Any plan without thoughtful engagement with advocates for the prevention and response to domestic violence and sexual assault will not get to major underlining causes of homelessness. We are disappointed with the short-sightedness of the proposals which do not consider that rapid rehousing and shelter-only responses may not work for persons in crisis from domestic violence and sexual assault. In many cases, homelessness is a symptom of the impact of trauma on families and individuals. These current ideas in the LAC Homelessness Plan will not move LA to a homeless-free community because they have failed to engage a trauma-informed lens and trauma-informed expertise.	Comment noted and language relative to domestic violence survivors was added to certain strategies. The needs of domestic violence survivors will be addressed in the implementation planning for various strategies.
Public	<p>As you undertake the critical task of addressing homelessness in Los Angeles County, I urge you to include survivors of domestic violence in this strategy. Many residents of Los Angeles, primarily women and children, find themselves without housing as a result of fleeing violent living arrangements. This segment of the homeless population must be included in any comprehensive plan to alleviate the overall crisis.</p> <p>Based on the 2015 Homeless Count, 21% of the City of Los Angeles' homeless population (5,458 out of 25,686) has experienced domestic violence. The numbers for the County of Los Angeles are likely to be even more significant. For many domestic violence survivors, homelessness is a direct consequence of seeking refuge from an abusive household. Most live well below the poverty line and lack safe housing options elsewhere. These families deserve better choices than staying in a violent household or living on the streets.</p> <p>As you may be aware, the Los Angeles Homeless Services Authority has made deep cuts to domestic violence shelter programs and transitional housing in the Los Angeles Continuum of Care application for federal funds. As part of its homelessness initiative, the County of Los Angeles urgently needs to "back fill" the funding cut of nearly \$671,000 to domestic violence shelters and transitional housing. These programs are widely recognized as effective for survivors of domestic violence, most of whom only require a safe place to rebuild their lives and get back on their feet. Funding has never been adequate for domestic violence services. In light of these federal cuts, additional County resources are needed now more than ever.</p>	Comment noted.

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Public	Enhance services for victims of domestic violence. This is a special needs group that responds very well to services and can move into stability with some assistance.	Recommendation noted.
Public	Focus needs to be put on how victims of domestic violence become homeless, the County should assist to prevent this from occurring.	Recommendation noted.
Public	I would like to see attention given to the 38% of the homeless who became homeless due to domestic violence. It is vital that we create a line item to focus on housing domestic violence victims/families in collaboration with domestic violence agencies. I think that calls to 211 need to have assessment tools that identify d.v. immediately and that protocols are put into place as soon as d.v. is identified. FSC's should have d.v. training or have a case manager that has attended domestic violence training put on through a d.v. agency.	Recommendation noted.
Public	<p>It is really important that you address homelessness and I am so glad you are taking steps to do just that. However, a very significant part of the Los Angeles homeless population is comprised of domestic violence victims and their families. Their only alternative to living in a violent home is to leave and often that puts them out on the street. The City of LA homeless count includes more than 5,000 such victims or 21% of the total.</p> <p>No single solution can address all homeless populations. They all need a home, but domestic violence victims need it to be safe, secure and confidential so that they will not be found by their abusers. Emergency shelters and transitional housing provided by domestic violence agency insure that victims are safe and secure.</p> <p>And yet, the Los Angeles Homeless Services Authority has made deep cuts to domestic violence shelter programs and transitional housing in the Los Angeles Continuum of Care application for federal funds. More than 150 beds are threatened by these cuts beds that victims desperately need. If your efforts are to help eradicate homelessness we need you to fill the void that the \$671,000 cut to domestic violence shelters and transitional housing created. Funding for domestic violence has always been inadequate, but this would be a beginning. With those funds restored we could continue to provide a safe and secure place where victims could get the services they need to start over and build healthy lives for themselves and their children. This not only helps the victims of today, but helps insure that there will be fewer victims tomorrow.</p>	Recommendation noted.
Public	<p>Many residents of Los Angeles, primarily women and children, find themselves without housing because they are fleeing violent living arrangements. As you address homelessness in Los Angeles County, I urge you to include survivors of domestic violence in this strategy. This segment of the homeless population must be included in any comprehensive plan to alleviate the overall crisis.</p> <p>Based on the 2015 Homeless Count, 21% of the City of Los Angeles homeless population (5,458 out of 25,686) has experienced domestic violence. The numbers for the County of Los Angeles are likely to be even more significant. For many domestic violence survivors, homelessness is a direct consequence of seeking refuge from an abusive household. Most live well below the poverty line and</p>	Recommendation noted.

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	<p>lack safe housing options elsewhere. These families deserve better choices than staying in a violent household or living on the streets.</p> <p>As you may be aware, the Los Angeles Homeless Services Authority has made deep cuts to domestic violence shelter programs and transitional housing in the Los Angeles Continuum of Care application for federal funds. As part of its homelessness initiative, the County of Los Angeles urgently needs to back fill the funding cut of nearly \$671,000 to domestic violence shelters and transitional housing. These programs are widely recognized as effective for survivors of domestic violence, most of whom only require a safe place to rebuild their lives and get back on their feet. Funding has never been adequate for domestic violence services. In light of these federal cuts, additional County resources are needed now more than ever.</p>	
Public	<p>Please assist Domestic Violence Shelter with funding. . I am a survivor and if it was not for a domestic violence shelter help I probably would not survived years ago when I end up on the streets because of domestic Violence perpetrated to me and my two children.</p>	Recommendation noted.
Public	<p>Please include families experiencing domestic violence in the plan. I've worked in homeless services for over 10-years and know firsthand that many of the families I've engaged with became homeless as a result of domestic abuse. They are a special population requiring safe, confidential, and supportive housing arrangements. They are a large segment of the homeless population in the county and will do well if they're unique needs are thoughtfully considered. Please show your commitment to this under-served segment of our community much in the way you support other special populations experiencing homelessness.</p>	Recommendation noted.
Public	<p>Victims of domestic violence need to be assisted, and corporate America should assist.</p>	Recommendation noted.
Rainbow Services	<p>As you undertake the critical task of addressing homelessness in Los Angeles County, I urge you to include survivors of domestic violence in this strategy. Many residents of Los Angeles, primarily women and children, find themselves without housing as a result of fleeing violent living arrangements. This segment of the homeless population must be included in any comprehensive plan to alleviate the overall crisis.</p> <p>Based on the 2015 Homeless Count, 21% of the City of Los Angeles' homeless population (5,458 out of 25,686) has experienced domestic violence. The numbers for the County of Los Angeles are likely to be even more significant. For many domestic violence survivors, homelessness is a direct consequence of seeking refuge from an abusive household. Most live well below the poverty line and lack safe housing options elsewhere. These families deserve better choices than staying in a violent household or living on the streets.</p> <p>As you may be aware, the Los Angeles Homeless Services Authority has made deep cuts to domestic violence shelter programs and transitional housing in the Los Angeles Continuum of Care</p>	Recommendation noted.

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	<p>application for federal funds. As part of its homelessness initiative, the County of Los Angeles urgently needs to “back fill” the funding cut of nearly \$671,000 to domestic violence shelters and transitional housing. These programs are widely recognized as effective for survivors of domestic violence, most of whom only require a safe place to rebuild their lives and get back on their feet. Funding has never been adequate for domestic violence services. In light of these federal cuts, additional County resources are needed now more than ever.</p>	
<p>Rainbow Services</p>	<p>As you undertake the critical task of addressing homelessness in Los Angeles County, I urge you to include survivors of domestic violence in this strategy. Many residents of Los Angeles, primarily women and children, find themselves without housing as a result of fleeing violent living arrangements. This segment of the homeless population must be included in any comprehensive plan to alleviate the overall crisis. I sat in the prevention summit and other colleagues were a part of the other summits to ensure that domestic violence remains part of our continuum of care in Los Angeles. The draft strategies completely ignore the unique needs and the unique housing and service interventions that are so critical for survivors of domestic violence. One size DOES NOT fit all when approaching the ever complicated issue of homelessness. While Rapid Rehousing may assist some families who have experienced DV, the model does not address the necessary safety needs of families fleeing seriously dangerous situations. Most DV families do not meet criteria for Permanent Supportive Housing and often entering an emergency shelter specific to homeless families once again neglects to address safety and security issues.</p> <p>Based on the 2015 Homeless Count, 20% of the County's homeless population (8,801 persons) has experienced domestic violence. For many domestic violence survivors, homelessness is a direct consequence of seeking refuge from an abusive household. Most live well below the poverty line and lack safe housing options elsewhere. These families deserve better choices than staying in a violent household or living on the streets.</p> <p>The Los Angeles Homeless Services Authority has made deep cuts to domestic violence shelter programs and transitional housing in the Los Angeles Continuum of Care application for federal funds. As part of its homelessness initiative, the County of Los Angeles urgently needs to “back fill” the funding cut of nearly \$873,000 to domestic violence services, shelters, and transitional housing. These programs are widely recognized as effective for survivors of domestic violence, most of whom only require a safe place to rebuild their lives and get back on their feet. Funding has never been adequate for domestic violence services. In light of these federal cuts, additional County resources are needed now more than ever.</p> <p>While cuts were made to transitional housing serving all populations, HUD's general application specifically asks how Continuum's of Care address the safety and security needs of survivors of domestic violence. HUD still sees addressing domestic violence as a necessary part of our Continuum of Care. Within the past year, HUD Secretary Castro stated: "...we remain committed to</p>	<p>Recommendation noted.</p>

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	<p>protecting all survivors of these forms of violence - women, children, and men. Having a safe, stable home is critical for survivors of domestic violence to start a new chapter in their lives, and HUD is doing everything in our power to help survivor open the door to a secure home, and hopefully, a new beginning." While LAHSA made the decision to not support these programs, it remains evident that HUD is committed to ensuring the needs of survivors are part of our overall strategy to address homelessness.</p> <p>I urge you to: 1) recognize transitional housing as a necessary and best practice for victims of domestic violence; 2) Ensure equal and safe access to housing resources for survivors of domestic violence through the CES &amp; HFSS systems - including addressing barriers that currently prevent such access; and 3) dedicate emergency funding to replace the \$872,688 that was reallocated through this years' HUD super NOFA process.</p>	
Rainbow Services	<p>I am writing you today in order to urge you to consider re-prioritizing funding for domestic violence victims and their children. According to the 2015 Homeless Count, approximately 21% of the Los Angeles homeless population has experienced domestic violence. After experiencing the trauma of domestic violence and escaping an abusive household, this population often finds itself unable to identify and locate adequate housing for themselves and their children. It is important to consider this population. Historically, domestic violence shelters and transitional housing have served as a vital and necessary step for these victims to create a better life for themselves and their children. As you are aware, the Los Angeles Homeless Service Authorities have made significant cuts to funding for domestic violence shelters and transitional housing. It is my hope, as a domestic violence case manager, that this funding be "back filled" to the various domestic violence shelters and transitional housing that have been losing their funding. If funding continues being cut to these vital organizations, the homeless population will increase and include more women and children living on the streets. As a population that often receives less than adequate services, it is important that this funding be recovered in order to help this population create a well-deserved life free from violence.</p>	Recommendations noted.
Rainbow Services	<p>The comments below address all sections of the LA County Draft Recommended Strategies to Combat Homelessness</p> <p>Despite the fact that more that 20% of the people assessed in LAHSA's homeless count report that they are a victim of domestic violence, the County's draft recommended strategies to combat homelessness mentions the term "domestic violence" just one time in 108 pages. The County's strategies fail to acknowledge the unique barriers to housing faced by families and individuals fleeing domestic violence, and lack recommendations pertaining to housing and service interventions which will meet their needs.</p> <p>Below are recommendations on how to address the needs of homeless domestic violence victims in</p>	All of the recommendations regarding individual strategies will be addressed during the implementation planning process.

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	<p>the strategy:</p> <p>A1: Homelessness Prevention for Families Strategy language: “Direct the Los Angeles Homeless Services Authority (LAHSA) and the Department of Public Social Services to convene a workgroup consisting of other relevant County departments and key community stakeholders to develop an integrated, comprehensive homeless prevention program for families which draws on the Homeless Family Solutions System (HFSS) model.”</p> <p>Recommendation: Workgroup must include providers who work with families who fleeing domestic violence.</p> <p>B3: Partner With Cities to Expand Rapid Re-Housing Strategy language: “Rapid re-housing is the most effective and efficient intervention for more than 50 percent of homeless individuals and families based on available data. The success rate for permanent placement is higher and recidivism rates are lower than other forms of housing interventions. However, it is not the best intervention for those who have been chronically homeless and/or face high barriers that impact housing placement.”</p> <p>Comment: Though it’s true that HUD is de-emphasizing transitional housing, HUD’s shifting policy priorities are not a one-size-fits-all approach. HUD has yet to present any research showing that rapid re-housing is more effective for victims of domestic violence than transitional housing.</p> <p>Recommendation: The plan should explicitly acknowledge that families fleeing domestic violence are included in the group who face high barriers that impact housing placement. The strategy document needs to better explain under what circumstances and for which populations transitional housing will remain an appropriate intervention, including for domestic violence victims. Transitional housing should be recognized as a necessary and best practice for victims of domestic violence as distinct from rapid re-housing and Housing First models for other homeless populations.</p> <p>Recommendation: Strategies for rapid-rehousing should ensure broad, flexible access to these expanded resources. This flexibility is vitally important because all of the HUD Continuum of Care dollars that have been reallocated to rapid re-housing are statutorily restricted to homeless persons living on the streets or in emergency shelter; homeless persons who wish to prevent homelessness or who are in transitional housing are NOT eligible to be assisted by those resources. Additionally, many DV victims often cannot maintain housing stability because, once “rapidly re-housed,” they must continue to flee from their abuser. Rapid re-housing vouchers must provide the flexibility to move when safety is threatened.</p> <p>B7: Interim/Bridge Housing for those Exiting Institutions</p>	
		Language was added to this strategy in response to this and other similar comments.

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<p>Strategy language: “There will be an historic opportunity to increase the supply of bridge housing in 2016, when LAHSA will stop funding approximately 2000 transitional shelter beds” per direction from the US Dept. of HUD to shift funding away from transitional housing.”</p> <p>Comment: The strategy fails to mention that many of these transitional shelter beds were located in facilities specifically designed to address the safety and supportive service needs of individuals and families fleeing domestic violence. In the County’s strategy, bridge housing is positioned as an intervention for those exiting institutions, as well as an intervention for those who need extra support due to substance use or health needs. The County’s strategy must recognize that individuals and families fleeing domestic violence are also in need of interim housing, specifically safe and confidential housing which will support a family’s transition from a violent home to a safe one.</p> <p>Recommendation: The County must dedicate emergency funding to replace the reallocated transitional housing funding so that these beds remain open and available to victims of domestic violence.</p> <p>Strategy D – Provide Case Management and Services Recommendation: Create a strategy for the specific case management needs of individuals and families fleeing domestic violence.</p> <p>Strategy E7: Strengthen the Coordinated Entry System and E12: Enhanced Data Tracking and Sharing Comment: The goals of improved data tracking, data sharing, HMIS integration, and broader use of HMIS across agencies under CES should be treated differently when it comes to domestic violence victims. Unlike other homeless subpopulations, the need to protect victim safety and confidentiality trumps all other concerns related to system integration and efficiency.</p> <p>Recommendation: The stated goals under this strategy need to be adjusted to account for the special safety, confidentiality and service needs of domestic violence victims. The CES “plan” assumes that all populations should access CES in the same way, are entered into HMIS in the same way, can be case managed and matched to housing through CES in the same way, etc. The plan needs to ensure that domestic violence victims have equal access to housing resources through CES/HFSS. However, the plan needs to recognize that the domestic violence system is an established system that is designed to meet the special needs of this high risk population. The goal, therefore, should be to identify and lay out strategies to better LINK the two systems so that domestic violence survivors can access housing resources, including housing location assistance and rental assistance.</p> <p>Strategy E8: Strengthen the Emergency Shelter System Strategy language: “Transform emergency shelters and transitional housing into interim/bridge housing from which homeless families/individuals/youth could transition to the best suited form of</p>	<p>Language was added to this strategy in response to this and other similar comments.</p>
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	<p>permanent housing, such as rapid re-housing or permanent supportive housing. Housing location search assistance should be provided at each shelter by community-based housing locators, since such assistance is key to ensuring that the shelter system operates as effectively as possible with enough “throughputs” to move people out of the shelter system, thereby creating shelter capacity for additional homeless families/individuals/youth, including individuals and families fleeing domestic violence.”</p> <p>Recommendation: The shelter needs of domestic violence victims – both emergency shelter and transitional housing – cannot be lumped together with the needs of other populations, including homeless families, and assumed that the needs are the same. LAHSA should be directed to separately analyze and present the shelter and permanent housing needs of domestic violence victims.</p> <p>Recommendation: Add language to ensure that bridge/interim housing programs will not follow a one-size-fits-all model: for example, shelter stays may need to extend beyond 90 days for certain individuals and families with special needs, such as victims of domestic violence who, for reasons of safety and trauma, may require longer shelter stays while permanent housing plans are being developed and implemented.</p> <p>Recommendation: For clarity, move strategy B7 (Interim/Bridge Housing for those exiting institutions) from the section on Subsidized Housing to Section E, to align and consolidate all references to interim housing in the strategy document.</p> <p>E14: Create a Coordinated System (Transition Age Youth) Placeholder          Comment: The stated goal to develop a parallel coordinated system for TAY is evidence that LAHSA and the County do make distinctions between different subgroups of homeless populations, due to their unique needs and circumstances. Just as the plan has a separate strategy for Youth CES, the plan should also have a separate strategy for Domestic Violence CES and Housing.</p> <p>Recommendation: The County should develop a similar comprehensive strategy to assess and expand existing programs for DV victims by working with relevant Departments/Agencies and Community-based organizations specializing in serving individuals/families fleeing domestic violence to complete an inventory of existing programs serving this group, and report back on how these programs can be coordinated and expanded. The report should include potential sources of funding from both the County and the City.</p> <p>Strategies could include:          - Co-locate a 40-hour certified (per Evidence Code 1037-1037.8), Domestic Violence Advocate at each CES hub, or at the very least each HFSS/FSC site. Just as HFSS hubs currently co-locate DPSS Eligibility Workers, DMH personnel, and DPH substance abuse counselors are co-located at</p>	
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	<p>each HFSS site, a DV Advocate/Counselor should also be co-located at each site.</p> <ul style="list-style-type: none"> <li>- Ensure that assessment tools include appropriate questions to address exposure to domestic violence. Because the safety and service needs of victims of domestic violence and their families are different than those utilizing standardized CES assessments, allow local domestic violence shelters to complete standardized CES assessments and other paperwork/applications/etc., rather than requiring that CES staff first complete this documentation, as part of the referral and services access process.</li> <li>- Enlist local domestic violence experts to provide training to CES staff utilizing the state mandated 40-hour domestic violence curriculum, per Evidence Code 1037-1037.8, and following updated guidance from HUD.</li> <li>- Expand the network of confidential crisis shelter and transitional housing for individuals/families affected by domestic violence. Transitional housing should be recognized as a necessary and best practice for victims of domestic violence, as distinct from rapid re-housing, permanent supportive housing, and housing first models for other homeless populations.</li> <li>- Recognize the need for rental assistance resources dedicated to domestic violence victims. While rapid re-housing may not be a safe or appropriate intervention for most domestic violence victims, the need for rental assistance to end homelessness remains a common denominator across populations. Therefore, additional rental assistance resources that are “pumped into CES” should remain flexible enough to assist all populations, including those who are not being rapidly re-housed. This flexibility is also vitally important because all of the HUD Continuum of Care dollars that have been reallocated to rapid re-housing are statutorily restricted to homeless persons living on the streets or in emergency shelter; homeless persons in transitional housing are NOT eligible to be assisted by those resources. Other resources, including local resources, should be targeted for rental assistance for domestic violence victims.</li> </ul>	
<p>South Asian Helpline and Referral Agency</p>	<p>Please include families experiencing domestic violence in the plan. I've worked in homeless services for over 10-years and know firsthand that many of the families I've engaged with became homeless as a result of domestic abuse. They are a special population requiring safe, confidential, and supportive housing arrangements. They are a large segment of the homeless population in the county and will do well if their unique needs are thoughtfully considered. Please show your commitment to this under-served segment of our community much in the way you support other special populations experiencing homelessness. Thank you.</p>	<p>Recommendations noted. Various strategies were modified to address the service needs of victims of domestic violence.</p>
<p>Su Casa ~ Ending Domestic Violence</p>	<p>It is completely unacceptable that the CAO's/CLA's January 7, 2016 “Comprehensive Homeless Strategy” report does not address the public health crisis of domestic violence as part of the holistic response to homelessness. The report does not recommend a single strategy to specifically address domestic violence. Too often, we hear people say that domestic violence and homelessness are separate issues. Yet approximately 50% of all women who are homeless report that domestic violence was the immediate cause of their homelessness (National Center on Family Homelessness, 2013). How can a “comprehensive strategy” report ignore the unique needs, and, by extension, the unique housing and service interventions, of more than one fifth of LA's homeless population? One size does not fit all when approaching the ever complicated issue of homelessness.</p>	<p>No response, as this comment is directed to Los Angeles City's Strategy.</p>

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	<p>The City has maintained a commitment to supporting domestic violence shelters and other services for victims for more than twenty years. However, as the City Controller's October 2015 audit of domestic violence services makes clear, current city funding is woefully inadequate to meet community need.</p> <p>Domestic violence is one of the leading causes of homelessness for women and children. The 2010 Federal Strategic Plan to Prevent and End Homelessness cites a study that says "Among mothers with children experiencing homelessness, more than 80% had previously experienced domestic violence." The availability of safe, affordable, and stable housing is critical for a survivor's ability to escape an abusive partner. Without viable housing options, survivors are often forced to remain in abusive relationships, accept inadequate or unsafe housing conditions, or become homeless. Domestic violence survivors with their children are present throughout the homeless/housing system.</p>	
Public	No recommendations focusing on older adults.	All subpopulations may be served as part of the greater population categories; however, language was added to various strategies to specifically identify older adults as a service population.
Public	Where is the focus on older adults?	All subpopulations may be served as part of the greater population categories; however, language was added to various strategies to specifically identify older adults as a service population.
Los Angeles Countywide HOPWA Advisory Committee	<p>The Los Angeles County HOPWA Advisory Committee (LACHAC) appreciates the opportunity to submit comments on Los Angeles County's <i>Draft Recommended Strategies to Combat Homelessness</i>. We are concerned that the strategies do not prioritize people living with HIV/AIDS (PLWHA) into housing, which is an integral part of reducing the transmission of HIV in Los Angeles County and moving towards an IDS-free generation. Below, we provide a summary of homelessness and HIV/AIDS in Los Angeles County, comments on the importance of prioritizing PLWHA into housing, and a recommendation for how to achieve this goal.</p> <p><i>Demographics</i></p> <p>As of 2014 there were an estimated 58,000 persons living with HIV/AIDS in Los Angeles County, representing 41% of all HIV/AIDS cases in California, and of those 58,000 people, 10,629 (18.1%) are undiagnosed. In addition, 75% of PLWHA live below 300% of the Federal Poverty Line (FPL),</p>	Recommendation noted.

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	<p>and homeless individuals account for 10.8% (4,960) of the diagnosed cases of HIV/AIDS in LA County 1. These numbers are exacerbated by the structural challenges to accessing housing and supportive services and the high cost of living in LA County.</p> <p><i>Housing and the HIV Care Continuum</i></p> <p>The United States Department of Housing and Urban Development (HUD) has documented the link between housing instability and both delayed HIV diagnosis and increased risk of acquiring and transmitting HIV infection. In addition, homelessness and unstable housing are strongly associated with inadequate access to healthcare and poor health outcomes. <b><i>It is important to note that as an infectious disease without a cure, HIV/AIDS continues to be a critical public health issue, and there is a disproportionate risk of transmission and lack of healthcare among the homeless and unstably housed.</i></b></p> <p>For PLWHA and those at a high-risk of contracting HIV, stable housing is the most effective health intervention, <b><i>over time having a bigger impact on preventing transmission and retaining PLWHA in medical care than demographics, health status, insurance coverage, mental illness and substance abuse, or other supportive services.</i></b> <b><i>2 Retention</i></b> in the continuity of medical care leads to reduced viral load (the amount of virus in the blood), which means that PLWHA are less likely to transmit HIV, and the overall County expenditures on healthcare decrease. Stable housing is also linked to more frequent HIV testing and fewer transmissions, and this three-pronged benefit of housing PLWHA will help bring LA County one step closer to realizing an AIDS-free generation. Based on this evidence, it is paramount that the County includes in its recommendations a strategy to prioritize PLWHA into housing. Both the County and City of Los Angeles primarily prioritize homeless individuals into housing through the Vulnerability Index – Service Prioritization and Decision Assistance Tool (VI-SPDAT) 3, which uses a scoring system to assess the “chronicity and medical vulnerability of homeless individuals”.<sup>4</sup> To date, HIV/AIDS is weighted extremely low because the serious public health aspect of HIV/AIDS as a transmittable and incurable disease has not been factored into the scoring system. Thus, current methodology for prioritizing housing exacerbates the vulnerability of homeless and unstably housed individuals living with HIV/AIDS who do not qualify as “chronically” homeless. This, along with the U.S. Department of Housing and Urban Development’s new definition of chronic homelessness, will leave many homeless persons with HIV/AIDS on the street and unhoused.</p> <p>However, there is a clear and simple opportunity for the County to prioritize PLWHA into housing while continuing to house the chronically homeless. LACHAC recommends that LA County include HIV/AIDS as an automatic high acuity designation for the Coordinated Entry System (CES) prioritization for housing in Los Angeles County. The reduction in transmissions of HIV and lower healthcare costs to the County that would result are important benefits for the community.</p>	
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## County of Los Angeles Homeless Initiative Public Comments

	LACHAC sincerely appreciates the opportunity to provide comments on Los Angeles County's <i>Draft Recommended Strategies to Combat Homelessness</i> . If you have any questions, please do not hesitate to contact me at 213-250-9481 x 11. Thank you.	
Public	Homeless living with HIV/AIDS is not prioritized, and should be. Housing is the biggest deterrent of the transmission of HIV/AIDS, outcomes greatly improve, and this is a public health issue.	Recommendation noted.
LA LGBT Center	We deeply appreciate the County's increased efforts to combat homeless. In examining the strategy and specifically looking at the target populations, there is no mention of LGBT people – particularly LGBT youth. LGBT youth make up approximately 40% of the homeless youth in LA County. We also know that LGBT youth are disproportionately represented within the foster care system in LA County – and particularly LGBT youth of color. I've included a link to a study by The Williams Institute that demonstrates the imperative for including LGBT people in any strategy to combat homeless. <a href="http://williamsinstitute.law.ucla.edu/press/new-study-confirms-40-percent-of-homeless-youth-are-gay/">http://williamsinstitute.law.ucla.edu/press/new-study-confirms-40-percent-of-homeless-youth-are-gay/</a>	Recommendation noted.
Children's Hospital Los Angeles	<ul style="list-style-type: none"> <li>• Homelessness Prevention for Youth – We applaud the inclusion of strategies designed to prevent homelessness but we are concerned that there isn't a strategy specific to preventing youth homelessness. In addition to working with our public system providers to ensure that youth don't transition to homelessness, there are innovative programs in other parts of the country that seek to identify youth that are likely to be kicked out of their homes. There are evidence based interventions that have been tested at UCLA (Project STRIVE is just one example – <a href="http://www.chicano.ucla.edu/research/project-strive-preventing-chronic-homelessness-among-runaway-teens">http://www.chicano.ucla.edu/research/project-strive-preventing-chronic-homelessness-among-runaway-teens</a>) that are appropriate for these types of families. Unfortunately, the recommendations do not identify any resources for this type of outreach and homeless prevention targeting youth.</li> <li>• Substance Abuse Treatment – Los Angeles County has several agencies, including CHLA, that receive youth- specific substance abuse prevention and treatment contracts from SAPC as part of an Adolescent Intervention, Treatment, and Recovery Program (AITRP). Unfortunately, the program requirements make serving homeless youth that are highly transient very difficult. Cases for individuals that don't have regular contact with their provider must be closed. While in the past we out posted treatment providers in shelters and drop in centers, we could not sustain these services since our staff spent all of their time opening and closing cases. As we wait to learn more about the transition to Drug Medi-Cal, we are concerned that there will continue to be significant administrative barriers preventing DMC from being an effective source of support for providing substance abuse treatment services to youth experiencing homelessness. In particular, we are concerned that the transition to Drug Medi-Cal may reduce our reimbursement for treatment and make our participation in the Drug Medi-Cal program impossible.</li> </ul>	Recommendation noted. Please refer to Strategy E14 - Enhanced Services for Transition Age Youth.
Downtown Women's Center	<p><b>INTRODUCTION</b></p> <p>We are heartened by the recent stakeholder engagement process and subsequent Homeless Initiative recommend strategies released by the County of Los Angeles – the increased attention and efforts towards addressing homelessness in our county is desperately needed. We also applaud the</p>	Recommendation noted.

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	<p>County’s openness to collaborating with the City and to including service providers in the planning process. We are pleased to see that the plan ground efforts in nationally recognized models and best practices in critical areas such as housing, health and support services, social enterprise and workforce development, and city-county coordination.</p> <p>However, the lack of recognition of unaccompanied homeless women as a subpopulation with specific vulnerabilities and service needs is glaring and troubling. Data tells us that the characteristics and vulnerabilities of homeless women are unique, and thus require specific attention and services. However, a woman experiencing homelessness in Los Angeles County currently enters a service system designed by and for the majority. These services often fail to appropriately address her higher likelihood of having survived violence, her unique healthcare or job-training needs, or the ways in which her goals for her future may vary from those of a homeless man.</p> <p>At this tipping point in our County’s approach to homelessness, we have the opportunity to make a significant leap forward. Just as with youth and veteran homelessness before, a commitment to and success in addressing a subpopulation opens doors to increased community will, resources, and visibility for the greater population. We urge the County to lead the nation by example in addressing the needs of unaccompanied homeless women. If you design for the majority, the minority falls through the cracks – the homeless women of greater Los Angeles deserve to be seen.</p> <p><b>TOPLINE RECOMMENDATIONS</b></p> <p>1. Recognize women as a vulnerable subpopulation among homeless individuals.</p> <p>Just as (very rightly) veterans and youth have been identified as subpopulations with unique vulnerabilities, so too must unaccompanied women be recognized. DWC’s experience tells us that homeless women are a tremendously resilient population in the face of staggering hardship. However, they deserve services that address the prevalence of trauma in their lives, which is often compounded by the relative lack of safety they experience in shelters and on the streets.</p> <ul style="list-style-type: none"> <li>• We recommend that unaccompanied women be recognized within the County recommended strategies as a subpopulation with specific needs.</li> <li>• We recommend that the County attach specific metrics and targets to reducing homelessness among women, as has been done for veteran and youth homelessness.</li> </ul> <p><b>NEXT STEPS</b></p> <p>The Downtown Women’s Center urges the County to fully fund its plan and to identify dedicated sources of funding for its strategies. The recommendations made above are not heavy-cost items, and will ultimately result in savings down the line. Further, once the strategies go into implementation, governance will take on great importance. Continuing to engage service providers and individuals with lived experience will be crucial to ensuring accountability and success. The Downtown Women’s Center looks forward to continuing to work with the County to end homelessness for good.</p>	
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