City of Culver City

Staff Report Details (With Text)

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Title:	CC- ACTION ITEM: 1) Discuss and Provide Direction on Eligibility and Prioritization Parameters (Including Whether to Require Residency) for Placement of Persons Experiencing Homelessness in the Project Homekey Interim and Permanent Supportive Housing Project; and 2) Approval of the Culver City By-Name-List and SPDAT Score as the Eligibility and Prioritization Method for Project Homekey.			
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Attachments:	1. 2022 -10-24 ATT No 1 Residency Requirement Survey.pdf			

Date	Ver.	Action By	Action	Result
10/24/2022	1	City Council Meeting Agenda		

CC- ACTION ITEM: 1) Discuss and Provide Direction on Eligibility and Prioritization Parameters (Including Whether to Require Residency) for Placement of Persons Experiencing Homelessness in the Project Homekey Interim and Permanent Supportive Housing Project; and 2) Approval of the Culver City By-Name-List and SPDAT Score as the Eligibility and Prioritization Method for Project Homekey.

Meeting Date: October 24, 2022

Contact Person/Dept.: Tevis Barnes/ Housing and Human Services Department
Phone Number: (310) 253-5782

Fiscal Impact: Yes [] No [X]   **General Fund:** Yes [] No [X]

Attachments: Yes [X] No []

Commission Action Required: Yes [] No [X]

Public Notification: (E-Mail) Meetings and Agendas - City Council (10/19/2022)

Department Approval: John M. Nachbar, City Manager (10/19/2022)

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RECOMMENDATION:

Staff recommends the City Council:

1) Discuss and Provide Direction on Eligibility and Prioritization Parameters (Including Whether to Require Residency) for Placement of Persons Experiencing Homelessness in the Project Homekey Interim and Permanent Supportive Housing Project; and

2) Approval of the Culver City By Name List and SPDAT Score as the Eligibility and Prioritization Method for Project Homekey.

BACKGROUND:

Subcommittee Recommendation

On September 12, 2022, the City Council directed staff to seek a recommendation from the City Council Ad Hoc Subcommittee on Housing and Homelessness (Councilmembers Fisch and McMorrin) (Subcommittee) on residency parameters for Persons Experiencing Homelessness (PEH). After discussing the issue at a meeting on September 27, 2022, the Subcommittee recommends using the Culver City By-Name-List (BNL) and SPDAT score to determine eligibility and prioritization for the City's Project Homekey Interim and Permanent Supportive Housing Project (PHK).

As discussed in detail below, the BNL process prioritizes PEH by level of need, as measured by SPDAT score. No minimum length of time in Culver City is required to be put on the BNL. However, PEH must have experienced homelessness for at least one year to be put on the BNL. (The one year could have been inside Culver City, outside Culver City, or some combination of inside and outside of Culver City.) In general, due to factors including the length of time necessary to complete the BNL intake process, those PEH who are on the BNL have typically been known to Culver City homeless outreach providers for an extended period of time. The Subcommittee does not recommend requiring Culver City residency for eligibility for PHK. The Subcommittee's intent with its recommendation is to provide access to supportive services, shelter, and housing to as many PEH as possible with available City resources, as well as to meet the PHK grant requirement of maintaining low barriers to access. The BNL and selection process for PHK are discussed in more detail later in this report.

Other Jurisdictions

In recent years, various governmental entities throughout the State have enacted residency requirements for PEH to determine eligibility to access supportive services, shelter, and housing. These residency restrictions range from no residency requirement, to preference for local PEH, to requiring the PEH to demonstrate third-party proof of residency for a specified minimum of years. Other requirements may include attending school in a jurisdiction as a full-time student or full-time employment in a jurisdiction for specific number of consecutive months.

To better understand the residency requirements of other jurisdictions, staff gathered information from seven jurisdictions. A cross-section of jurisdictions was included in the survey to determine how differing governmental entities define residency requirements for PEH. The following governmental entities were surveyed to inform this report:

- City of Beverly Hills   (Westside City)
- County of San Mateo   (San Francisco Bay Area)
- County of Merced   (Central Valley County)

- City of Pasadena   (Non-LAHSA CoC)
- City of Placentia   (Northern Orange County)
- City of Santa Monica (Westside City)
- City of West Hollywood (Westside City)

Detailed below is a summary of the survey findings. More detailed information can be found under Attachment 1. The listing below is organized in descending order by most restrictive to least restrictive residency requirements for PEH to utilize services and access shelter and housing. The City of Santa Monica is the most restrictive in requiring proof of residency, and the Cities of Beverly Hills and West Hollywood are the least restrictive.

City of Santa Monica - The City of Santa Monica uses defined Santa Monica Program Participant criteria for City-funded services. Criteria includes third-party proof of residency for five years, full-time work in the city for six consecutive months, documentation of high utilization of city services, and/or proof of full-time attendance at local schools.

City of Pasadena - Preference is given to PEH in the city. A Third Party Observation of Homelessness form <https://pasadenapartnership.org/wp-content/uploads/2018/06/Written-Third-Party-Verification-of-Homeless-Status_2018.pdf> is completed to verify residency/experiencing homelessness in Pasadena.

County of Merced - Priority for services is given to local PEH entering through the CES. Based on the need and willingness of the PEH from outside the jurisdiction, non-local PEH may participate in the Homeward Bound Program, which reunites the PEH with family members. Homeward Bound participation may involve providing an airline ticket to other cities/states.

City of Placentia - Based on a Memorandum of Understanding with other Northern Orange County cities to create navigation centers, shelter beds and permanent housing, the City of Placentia gives priority to available supportive services/shelter to PEH from the Northern Orange County cities.

County of San Mateo - The County began construction on a Navigation Center in April 2022. Access to the Navigation Center and its services will be by referral only. There are no walk-up or drop-in services. Proof of San Mateo County residency will be an eligibility requirement to access the Navigation Center.

City of West Hollywood - A self-attestation form is utilized to affirm the unhoused individual is a West Hollywood community member. There is no defined residency requirement.

City of Beverly Hills - No residency requirement.

Project Homekey

Culver City's Project Homekey (PHK) is the first permanent supportive housing project created in the City and first interim housing resource for homeless individuals. (Upward Bound House was built over 10 years ago and serves a very specific population of homeless children and their families.)

PHK is designed to provide 73 harm reduction-based, low barrier Interim Housing (IH) and Permanent Supportive Housing (PSH) service enriched housing units to chronically homeless individuals. Under the US Department of Housing and Urban Development (HUD) Title 24 Code of Federal Regulation (24 CFR) Part 578.3, chronic homelessness is used to describe people who have experienced homelessness for at least a year while struggling with a disabling condition such as a

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serious mental illness, substance use disorder, or physical disability.

Homekey Program NOFA Requirements

Per the Project Homekey Round 2 (PHK) Notice of Funding Availability (NOFA) under Sections 502 (Tenant Selection) and 503 (HMIS), participants enrolled in the Culver City PHK must be referred through the Coordinated Entry System (CES) and must be identified through the Homeless Management Information System (HMIS). Additionally, under Section 502 of the PHK NOFA, referral protocols for Homekey assisted units must be developed in collaboration with the local Continuum of Care (CoC). The CES Lead for Service Planning Area (SPA) 5 is Saint Joseph Center (SJC). Through a contract with Culver City, SJC also provides outreach services and case management to the Culver City unhoused community. The entity overseeing the CoC for the County of Los Angeles and the City of Los Angeles is the Los Angeles Homeless Services Authority (LAHSA). The Los Angeles Homeless Services Authority also oversees the HMIS system for the County of Los Angeles and provides guidance to the CES lead agencies throughout the County of Los Angeles.

Accessibility and Non-Discrimination

Section 505 of the Homekey NOFA defines accessibility and non-discrimination requirements of the PHK grant award. Per Section 505 of the Homekey NOFA, grantees shall comply with the requirements of the Americans with Disabilities Act of 1990, the Fair Housing Amendments Act, the California Fair Employment and Housing Act, the Unruh Civil Rights Act, Government Code section 11135, Section 504 of the Rehabilitation Act of 1973, and all regulations promulgated pursuant to those statutes, including 24 CFR Part 100, 24 CFR Part 8, and 28 CFR Part 35. To assure compliance with the Homekey funds, staff confirmed with the State Department of Housing and Community Development (HCD), LAHSA, and the County of Los Angeles that the City's proposed eligibility and prioritization process for PHK (as proposed below) is allowable under the Homekey funding award.

DISCUSSION

By Name List and SPDAT Score

The City Council Subcommittee recommends that the City use the Culver City By Name List (BNL) and SPDAT Score to determine eligibility and prioritization for enrollment into PHK. The BNL is established by the Culver City SJC Homeless Outreach Team in conjunction with Culver City Housing and Human Services (HHS) staff. The BNL allows the City to identify high users of homeless outreach services and determine their level of need (acuity). The individuals on the BNL are unhoused individuals with frequent interactions with the Culver City SJC Outreach Team and who are known "by name". These individuals' acuity is measured through SPDAT. The SPDAT is an assessment survey used nationwide by front-line workers that work with PEH to determine risk and prioritization for assistance. Use of the SPDAT is an industry standard practice that is used by the CoC to determine acuity to best service and meet the service and housing or shelter needs of PEH. SPDAT scores range from 0 to 8+. A score of 0 to 3 indicates that no housing intervention is recommended. A score of 4 to 7 indicates that Rapid ReHousing or Interim Housing is recommended.

A score of * and up indicates that permanent supportive housing is recommended. Eligibility for PHK will be limited to those PEH on the BNL, and prioritization will be made by SPDAT score.

The SPDAT is an extensive questionnaire which takes a minimum of 45 minutes to administer. This is usually done at the unhoused persons location on the street and may take several sessions to complete. For this reason, people who appear on the BNL are typically those who have frequent interactions with the SJC Outreach Team over a prolonged period. However, it is not a requirement to have frequent interactions with the SJC Outreach Team to appear on the BNL.

The BNL collects the following information on the PEH who are encountered in Culver City:
- Name
- Date of Birth (DOB)
- Social Security Number (SSN)
- SPDAT Score
- Length of Time Unhoused in Culver City
- HMIS Number
- Location residing in Culver City
- If Unhoused Person has a Pet
- If Unhoused Person is Part of Couple
- Case Manager Contact Information
- Expressed Willingness to Participate in Culver City PHK

Homekey Project Referral/ Matching Process

The proposed PHK referral process is as follows:

- **Step 1** -SJC and City staff establish the Culver City BNL
- **Step 2** - Staff uploads PHK housing units to the Resource Management Systems (RMS), as required by the local CoC to determine available housing resources by SPA 5.
- **Step 3** - SJC provides the BNL to LAHSA. LAHSA verifies that the unhoused individual is in the HMIS and confirms HMIS Number
- **Step 4** - LAHSA verifies with SJC the unhoused individual's chronic homeless status (homeless for a least one year).
- **Step 5** - SJC Match Coordinator matches individuals on the BNL to either Permanent Supportive Housing or Interim Housing
  - o Unhoused individuals with SPAT Score of 12 or higher matched/referred for PSH
  - o Unhoused individuals with SPAT Score of 8 and below matched/referred to IH
- **Step 6-** Culver City Housing and Human Services staff reviews match and verifies chronic homeless status, Culver City BNL prioritization and SPDAT score
- **Step 7** - Culver City Housing and Human Services Director approves referral
- **Step 8** - Referral submitted to Exodus Recovery Inc. (Exodus) to start lease-up and case management process. Exodus is the lead operator, property manager and service provider for the Culver City PHK.

FISCAL ANALYSIS:

There is no fiscal impact associated with discussion of this item.

ATTACHMENTS:

1. Residency Requirement Survey Matrix

MOTIONS:

That the City Council:

1) Discuss and provide direction on eligibility and prioritization parameters (including whether to require residency) for placement of persons experiencing homelessness in the Project Homekey Interim and Permanent Supportive Housing Project; and

2) Approve the Culver City By Name List and SPDAT Score as the eligibility and prioritization method for Project Homekey; and

3)   Provide other direction to the City Manager as deemed appropriate