

## ARTICLES

# A Tale of Two Tent Cities: The Critical Role of Housing Engagement in Addressing Homeless Encampments

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### ABSTRACT

*Local governments have essentially three choices in responding to the presence of homeless encampments. They can adopt a law enforcement approach, forcing individuals to move their camps on pain of arrest for trespassing. They can adopt an “out of sight, out of mind” approach, designating a specified area where homeless individuals are permitted to camp. Or they can adopt a housing engagement approach, treating the sanctioned camp as a housing-focused, low-barrier outdoor emergency shelter and working with homeless individuals to get them out of homelessness and into housing. The first approach does nothing to address the problem of unsheltered homelessness, and recent court decisions limit the ability of governmental authorities to pursue it. The second approach may be superficially appealing as a low-cost alternative, but experience demonstrates that it can entail significant hidden costs and create a toxic and poorly regulated environment. Moreover, it does nothing to reduce the number of individuals experiencing unsheltered homelessness. By contrast, the housing engagement approach actually works to get people out of homelessness and into housing, substantially reduces the hidden costs of homeless “tent city” encampments, and promotes a pro-social well-regulated environment. Using the experience of Gainesville, Florida as a case study, this Article summarizes the outcomes achieved with the housing engagement approach—a 222-person encampment closed with zero arrests, less than ten percent dispersal into the local community,*

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*and 145 successful exits into permanent housing in less than two years—and identifies best practices for implementing a housing engagement model in responding to the problem of unsheltered homelessness.*

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## I. INTRODUCTION

### *A. Factual and Legal Context*

Unsheltered homelessness is endemic in the United States. It is an intractable problem not only in major cities but also in smaller communities.<sup>1</sup> Annual

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1. REBECCA COHEN ET AL., U.S. DEP’T OF HOUS. & URB. DEV., UNDERSTANDING ENCAMPMENTS OF PEOPLE EXPERIENCING HOMELESSNESS AND COMMUNITY RESPONSES: EMERGING EVIDENCE AS OF LATE 2018 21 (2019), <https://www.huduser.gov/portal/publications/Understanding-Encampments.html>.

surveys confirm that more than 580,000 individuals are now homeless in the United States,<sup>2</sup> despite more than a decade of concerted efforts to provide supportive housing opportunities for those in need.<sup>3</sup> While a handful of states consistently report higher numbers of homeless persons than others,<sup>4</sup> the problem is by no means confined to those states: homeless individuals number in the thousands in forty-eight states and the District of Columbia.<sup>5</sup>

Though the governmental response at the federal and state levels has been to provide resources to address the problem,<sup>6</sup> all too frequently municipalities have sought to drive the problem away by criminalizing conduct that is essential to survival.<sup>7</sup> Regulations target not only the activities of homeless persons themselves, such as sleeping or panhandling,<sup>8</sup> but also charitable efforts to provide food, clothing, and other supports.<sup>9</sup>

Time and again this law enforcement approach has proven ineffective.<sup>10</sup> Like squeezing a balloon, forcing homeless individuals to move or abandon their campsites on pain of arrest merely leads them to find another nearby area where they can set up their camps.<sup>11</sup> Moreover, the disruption adds to the burdens they face, making it harder for them to address the underlying problems that led to

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2. NAT'L ALL. TO END HOMELESSNESS, STATE OF HOMELESSNESS: 2021 EDITION 1 (2021), [https://endhomelessness.org/wp-content/uploads/2022/09/StateOfHomelessness\\_2021.pdf](https://endhomelessness.org/wp-content/uploads/2022/09/StateOfHomelessness_2021.pdf) (reporting January 2020 data). The actual number may be substantially higher. See NAT'L LAW CTR. ON HOMELESSNESS & POVERTY, DON'T COUNT ON IT: HOW THE HUD POINT-IN-TIME COUNT UNDERESTIMATES THE HOMELESSNESS CRISIS IN AMERICA 6–7 (2017), <https://homelesslaw.org/wp-content/uploads/2018/10/HUD-PIT-report2017.pdf>.

3. NAT'L ALL. TO END HOMELESSNESS, *supra* note 2, at 4 (reporting data from 2007–2020 showing just a ten percent decline in the numbers over time).

4. In the most recent count, California, New York, Florida, Texas, and Washington accounted for well more than half of the national total (330,458 of 580,466). *Id.* at 6.

5. The only states with smaller numbers are North Dakota (541) and Wyoming (612). *Id.* at 5.

6. See, e.g., *Homeless Emergency Assistance and Rapid Transition to Housing Act*, HUD EXCH., <https://www.hudexchange.info/homelessness-assistance/hearth-act/> (last visited Apr. 14, 2023). The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act includes the U.S. Dept. of Housing & Urban Development's Continuum of Care (CoC) program and the Emergency Solutions Grant (ESG) program. A wide range of other federal agencies provide targeted assistance to agencies serving people without housing, including the U.S. Dept. of Veterans Affairs, the U.S. Dept. of Health & Human Services, the U.S. Dept. of Education, and the Substance Abuse and Mental Health Services Administration (SAMHSA). *Federal Homelessness Assistance Program*, NAT'L HOUS. CONF., <https://nhc.org/policy-guide/federal-rental-and-homeownership-programs/federal-homelessness-assistance-program/> (last visited Apr. 14, 2023); *Homelessness Programs and Resources*, SAMHSA, <https://www.samhsa.gov/homelessness-programs-resources> (last visited Apr. 14, 2023).

7. NAT'L LAW CTR. ON HOMELESSNESS AND POVERTY, HOUSING NOT HANDCUFFS 2019: ENDING THE CRIMINALIZATION OF HOMELESSNESS IN U.S. CITIES 37 (2019), <https://homelesslaw.org/wp-content/uploads/2019/12/HOUSING-NOT-HANDCUFFS-2019-FINAL.pdf>.

8. *Id.* at 12–14, 37–47.

9. *Id.* at 14, 46.

10. *Id.* at 63–70, 105.

11. *Id.* at 64. See also Evanie Parr, *It Takes a Village: Practical Guidance for Authorized Homeless Encampments*, SEATTLE UNIV. SCH. OF L. HOMELESS RTS. ADVOC. PROJECT 1, 37 (May 4, 2018) (noting that when the city of Tacoma, Washington cleared out a large homeless encampment in the spring of 2017, “it forced those people into other areas of town, growing some of the other [local] encampments from around a dozen residents to thirty or forty.”).

their homelessness and, in some cases, creating additional barriers that make it more difficult to access housing.<sup>12</sup>

Targeting charitable service providers fares no better. Restricting the delivery of food and other resources does nothing to help homeless persons get housed and may even distract them from pursuing efforts to do so as they are forced to devote more of their time and energy simply to obtaining the sustenance they need to survive.<sup>13</sup> Targeting charitable service providers can also lead to significant adverse publicity for local officials because regulations restricting the sharing of food and other necessities are often seen as mean-spirited.<sup>14</sup>

In addition, the law enforcement approach faces serious legal constraints. Local laws restricting food sharing have been successfully challenged both on religious freedom<sup>15</sup> and free speech<sup>16</sup> grounds. Panhandling restrictions have consistently been found to violate free speech rights: every restriction challenged in court since 2015 has been overturned or repealed.<sup>17</sup> Law enforcement sweeps of homeless campsites have been found to violate the Fourth and Fourteenth Amendments.<sup>18</sup> And landmark court cases in *Pottinger v. City of Miami*<sup>19</sup> and *Martin v. City of Boise*<sup>20</sup> have established that persons may not be arrested for sleeping or sheltering themselves on public property unless adequate alternatives are available to them.<sup>21</sup>

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12. Parr, *supra* note 11, at 63–70, 105.

13. *Id.* at 46.

14. *See, e.g., id.* at 58 (designating anti-food-sharing efforts in Kansas City, Missouri as an “especially egregious” bad practice meriting inclusion in a “Hall of Shame”); *Food Sharing Limits End in Gainesville*, NAT’L COAL. FOR HOMELESS (Aug. 19, 2011), <https://nationalhomeless.org/soup-kitchen-limits-end-gainesville/> (noting that limits on food sharing had “helped garner Gainesville the fifth spot on NCH’s 2009 Ten Meanest Cities” list).

15. *Abbott v. City of Fort Lauderdale*, 783 So. 2d 1213, 1214 (Fla. Dist. Ct. App. 2001). *See also* *Big Hart Ministries Ass’n v. City of Dallas*, No. 3:07-CV-0216-P, 2013 WL 12304552, at \*19 (N.D. Tex. Mar. 25, 2013) (concluding that Dallas ordinance restricting food sharing violated Texas Religious Freedom Restoration Act).

16. *Fort Lauderdale Food Not Bombs v. City of Fort Lauderdale*, 901 F.3d 1235, 1238 (11th Cir. 2018) (concluding that Food Not Bombs’s food sharing events qualified as expressive conduct protected by First Amendment), *appeal after remand*, 11 F.4th 1266 (11th Cir. 2021) (concluding that ordinance as applied violated First Amendment). *But see* *First Vagabonds Church of God v. City of Orlando*, 638 F.3d 756, 758 (11th Cir. 2011) (upholding ordinance restricting food sharing as a reasonable regulation of expressive conduct).

17. *See, e.g., Vigue v. Shoar*, 494 F. Supp. 3d 1204 (M.D. Fla. 2020). *See also* NAT’L L. CTR. ON HOMELESSNESS & POVERTY, HOUSING NOT HANDCUFFS: A LITIGATION MANUAL 8 (2017), <https://homelesslaw.org/wp-content/uploads/2018/10/Housing-Not-Handcuffs-Litigation-Manual.pdf>.

18. *E.g., Pottinger v. City of Miami*, 810 F. Supp 1551, 1570–73 (S.D. Fla. 1992); *Lavan v. City of Los Angeles*, 693 F.3d 1022, 1031–33 (9th Cir. 2012).

19. 810 F. Supp. 1551.

20. 902 F.3d 1031 (9th Cir. 2018), *amended by*, 920 F.3d 584 (9th Cir. 2019).

21. To do so violates the Eighth Amendment. *See* 902 F.3d at 1046–49; 920 F.3d at 615–18. For an insightful discussion of *Martin v. City of Boise* and appropriate governmental responses to its holding, see generally Sara K. Rankin, *Hiding Homelessness: The Transcarceration of Homelessness*, 109 CAL. L.R. 559 (2021).

### B. “Out of Sight/Out of Mind” Response

Faced with the questionable practical and legal viability of the law enforcement approach, some local governments have tried to address the problem of unsheltered homelessness by designating a site where homeless persons are permitted to camp.<sup>22</sup> In some cases, a previously-unauthorized encampment is officially sanctioned.<sup>23</sup> In others, a city may designate a previously-unused site on land it owns.<sup>24</sup> Alternatively, a city may authorize private landowners (religious or otherwise) to establish encampments on their private property.<sup>25</sup>

Officially sanctioned encampments may be permanently located on a designated site<sup>26</sup> or may move from site to site on a regular schedule.<sup>27</sup> They may be self-managed by the residents<sup>28</sup> or managed by a service provider,<sup>29</sup> or by the municipality itself.<sup>30</sup> Services provided typically include potable water, bathrooms, and waste removal.<sup>31</sup> Other services may include showers, laundry facilities, storage lockers, and internet service.<sup>32</sup> Meals may be provided by a rotation of volunteer groups.<sup>33</sup> Outside agencies may come to the site to provide medical, legal, and other assistance.<sup>34</sup> Case management services may be offered to connect residents with housing opportunities, disability benefits, or job training.<sup>35</sup>

Compared with the law enforcement approach, officially sanctioned encampments represent an improvement in local government responses to unsheltered homelessness. By designating a site where people are allowed to be, sanctioned

22. See Rankin, *supra* note 21, at 575–80, 598–602; Parr, *supra* note 11, at 9–10.

23. See Parr, *supra* note 11, at 11, 29–32 (citing examples in Seattle, Washington and Portland, Oregon). See also NAT’L L. CTR. ON HOMELESSNESS & POVERTY, TENT CITY, USA: THE GROWTH OF AMERICA’S HOMELESS ENCAMPMENTS AND HOW COMMUNITIES ARE RESPONDING (2017), [https://homelesslaw.org/wp-content/uploads/2018/10/Tent\\_City\\_USA\\_2017.pdf](https://homelesslaw.org/wp-content/uploads/2018/10/Tent_City_USA_2017.pdf) [hereinafter TENT CITY, USA].

24. See Parr, *supra* note 11, at 11 (citing examples in San Diego, California and Tacoma, Washington).

25. *Id.* at 12–13, 42 n.230 (citing examples of university- and church-hosted encampments in Seattle, Washington).

26. *Id.* at 31 (for example, Dignity Village in Portland, Oregon has been located on the same site since 2001).

27. *Id.* at 42 (for example, Tent City 3 in Seattle/King County, Washington moves to a new designated site every 90 days); *Tent City F.A.Q.’s*, SEATTLE HOUS. & RES. EFFORT & WOMEN’S HOUS. EQUAL. & ENHANCEMENT LEAGUE, <http://www.sharewheel.org/tent-city-f-a-q-s> (last visited Apr. 14, 2023).

28. Parr, *supra* note 11, at 29–34 (describing self-managed camps in Seattle, Washington and Portland, Oregon and summarizing the challenges and opportunities of this management model).

29. *Id.* at 24–28, 34–42 (describing service-provider operated camps in Seattle, Washington, San Diego, California, and Tacoma, Washington and summarizing the challenges and opportunities of this management model).

30. See discussion *infra* Part II (describing municipality-managed encampment in Gainesville, Florida).

31. See, e.g., Parr, *supra* note 11, at 13, 21, 27, 36, 38–39 (noting amenities provided in Seattle’s, San Diego’s and Tacoma, Washington’s sanctioned encampments). See also COHEN ET AL., *supra* note 1, at 9–10, 15–16.

32. Parr, *supra* note 11, at 18, 21, 36. See also COHEN ET AL., *supra* note 1, at 9–10, 15–16.

33. Parr, *supra* note 11, at 18, 27. See also COHEN ET AL., *supra* note 1, at 9–10, 15–16.

34. Parr, *supra* note 11, at 15, 18, 38–39. See also COHEN ET AL., *supra* note 1, at 9–10, 15–16.

35. Parr, *supra* note 11, at 27, 39. See also COHEN ET AL., *supra* note 1, at 9–10, 15–16.

encampments avoid the instability and insecurity produced by requiring homeless individuals to move or abandon their campsites.<sup>36</sup> By stabilizing living arrangements, sanctioned encampments “can eliminate (or at least reduce) some of the stress of being unhoused, allowing people to focus on rehabilitation.”<sup>37</sup> Moreover, sanctioned encampments facilitate efficient service delivery, not only for basic needs like food, potable water, toilets, and waste removal, but also for medical, legal, and case management services that people experiencing homelessness often need.<sup>38</sup> Sanctioned encampments can also offer a greater sense of autonomy and privacy compared with emergency shelters and a greater sense of community than may be found in individual unsanctioned camps.<sup>39</sup>

However, officially sanctioned encampments are not a solution to homelessness.<sup>40</sup> Absent intensive, housing-focused case management efforts, they do not have a strong record of getting people out of homelessness and into housing.<sup>41</sup> Their cost may siphon governmental resources that could otherwise go toward

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36. Parr, *supra* note 11, at 9–10.

37. *Id.* at 5.

38. *Id.* at 5, 10.

39. *Id.*

40. See COHEN ET AL., *supra* note 1, at 16 (noting that sanctioned encampments “are not themselves a solution to homelessness”). Persons in such encampments are considered homeless by the US Department of Housing and Urban Development and are included among the unsheltered homeless in HUD’s annual point-in-time surveys. See U.S. DEPT. OF HOUS. AND URBAN DEV., POINT-IN-TIME COUNT METHODOLOGY GUIDE 18 (2014), <https://files.hudexchange.info/resources/documents/PIT-Count-Methodology-Guide.pdf> (quoting 24 CFR 578.3, Homeless Definition Final Rule). Additionally, just like people literally living on the streets, persons in such encampments are susceptible to worsening physical, mental health, and substance abuse issues the longer they remain unhoused. See, e.g., Rankin, *supra* note 21, at 568 (“[P]eople experiencing unsheltered chronic homelessness . . . suffer from higher rates of poor physical and mental health and substance use disorders than homeless populations generally.”); Benjamin F. Henwood et al., *Permanent Supportive Housing: Addressing Homelessness and Health Disparities?*, 103 AM. J. PUB. HEALTH S188, S188 (2013) (“Long-term homelessness is a significant determinant of poor health.”).

41. Data on the success of sanctioned encampments in achieving housing for residents is limited. A review of the literature discloses concrete data only for encampments in Seattle, Washington (121 out of 759 residents (16%) transitioned to permanent housing); Tacoma, Washington (39% of encampment residents housed, 33% unknown, and 28% homeless); Portland, Oregon (approximately 33% housed); Charleston, South Carolina (“more than half” of 115 encampment residents housed); Houston, Texas (42 of 73 encampment residents (58%) housed); and Fresno, California (103 out of an estimated 150-200 encampment residents housed). See COHEN ET AL., *supra* note 1, at 16 (Seattle, Washington); KIMBERLY BURNETT ET AL., U.S. DEP’T OF HOUS. & URB. DEV., TACOMA, WASHINGTON COMMUNITY ENCAMPMENT REPORT 8 (2020), <https://www.huduser.gov/portal/publications/Tacoma-Encampment-Report.html> (Tacoma, Washington); NAT’L COAL. FOR THE HOMELESS, TENT CITIES IN AMERICA: A PACIFIC COAST REPORT 13, 49–50 (2010), <https://nationalhomeless.org/wp-content/uploads/2014/06/Tent-Cities-Report-FINAL-3-10-10.pdf> (Portland, Oregon and Fresno, California); TENT CITY, USA, *supra* note 23, at 50 (Charleston, South Carolina); LAUREN DUNTON ET AL., U.S. DEP’T OF HOUS. & URB. DEV., HOUSTON, TEXAS COMMUNITY ENCAMPMENT REPORT 8 (2020), <https://www.huduser.gov/portal/publications/Houston-Encampment-Report.html> (Houston, Texas). See also Parr, *supra* note 11, at 36 (reporting “very few” connections with housing in San Diego); *id.* at 40 n.218 (reporting exits to housing of only 9 out of 140 encampment residents in Tacoma, Washington); *id.* at 31–32 (noting that in Portland, Oregon, the city complained in 2012 that individuals were staying at Dignity Village “indefinitely,” contrary to the intent that the camp be used as a transitional living space, and some individuals have lived there for eight to ten years).

supportive housing,<sup>42</sup> and if local authorities seek to require use of a sanctioned encampment by vigorously enforcing bans on camping elsewhere, they can be seen essentially as internment camps for the homeless.<sup>43</sup>

### C. *A Better Alternative: Housing Engagement Model*

On the other hand, when paired with intensive housing-focused case management and steps to establish or prioritize housing resources for the residents, officially sanctioned encampments can achieve a meaningful reduction in the number of people experiencing homelessness.<sup>44</sup> Case studies in 2019 of efforts in Chicago, Houston, San Jose, and Tacoma suggest that local governments are coalescing around a strategy that provides critical support when an unauthorized encampment is to be cleared and closed.<sup>45</sup> Specifically, these cities are providing or funding “resource-intensive outreach to help encampment residents connect with needed services and to try to ensure that the closure does not mean an encampment resident has no place to go.”<sup>46</sup>

Local governments contemplating the creation of an officially sanctioned encampment thus face a crucial question: is the encampment intended to be the “solution” to visible unsheltered homelessness by moving homeless people out of sight, or is it intended to be a transitional resource that provides a stepping stone for people to get out of homelessness and into housing? Our thesis—that the former risks significant unintended adverse consequences and that the latter offers real promise of significant reduction in unsheltered homelessness—is grounded in the experience of Gainesville, Florida, which tried both approaches.

Without housing engagement, Gainesville’s “out of sight, out of mind” sanctioned encampment (known as Dignity Village) grew to an estimated 200 residents in less than a year,<sup>47</sup> generated multiple calls for emergency medical service or police response on a daily basis,<sup>48</sup> and achieved zero documented exits to permanent housing.<sup>49</sup> Reports of sex trafficking, drug trafficking, and violent

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42. Parr, *supra* note 11, at 9 n.10.

43. Rankin, *supra* note 21, at 602–03.

44. See discussion *infra* Part IV.

45. LAUREN DUNTON ET AL., U.S. DEP’T OF HOUS. & URB. DEV., EXPLORING HOMELESSNESS AMONG PEOPLE LIVING IN ENCAMPMENTS AND ASSOCIATED COST: CITY APPROACHES TO ENCAMPMENTS AND WHAT THEY COST 15 (2020), <https://www.huduser.gov/portal/sites/default/files/pdf/Exploring-Homelessness-Among-People.pdf>.

46. *Id.*

47. BETTY M. BAKER, DIGNITY VILLAGE: REPORT AND RECOMMENDATIONS 1 (2015), <https://www.wuft.org/news/files/2015/06/c0a43f8a-cd94-41c5-8d3b-acb754fd2fa6.pdf> (reporting “approximately 200” residents in Dignity Village as of April 2015) [hereinafter DIGNITY VILLAGE: REPORT AND RECOMMENDATIONS].

48. *Id.* at 26 (reporting 438 calls for police response between May 2014 and January 2015); *id.* at 27 (reporting 212 calls for EMS response between June 2014 and March 2015).

49. A search of the local Homeless Management Information System reveals no records of exits to housing for Dignity Village residents during the time the camp operated. In fact, no data exists in the HMIS on campground residents from the camp’s 2014 inception until the start of the closure process in 2019. It was only in 2019 that an initial roster was developed allowing program managers to have an accurate understanding of who was staying in the camp. See discussion *infra* Part III.A.1. At the March

assaults were common.<sup>50</sup> Some city workers and paramedics refused to enter the encampment without a police escort.<sup>51</sup>

By contrast, when Gainesville partnered with GRACE<sup>52</sup> (the local low-barrier emergency shelter service provider) to close the sanctioned encampment and create a temporary housing-focused campground on the shelter's campus, the project achieved remarkable success. GRACE's approach to service prioritizes relationship building and meeting people where they are, using trauma-informed care and other best practices, to provide housing-focused services in a safe, respectful way. Starting with a confirmed roster of 222 Dignity Village residents in September 2019, GRACE was able to reduce the roster to just five individuals in less than two years. More than half were successfully housed in apartments or other permanent housing. Less than ten percent dispersed into the local community. And Dignity Village was cleared and closed with zero arrests.

Based on this experience, we conclude that sanctioned encampment projects should not be framed only as an effort to manage unsheltered homelessness or to make it less visible. Rather, local governments should conceptualize a sanctioned encampment essentially as an outdoor low-barrier emergency shelter, requiring ongoing housing engagement, trained staff, appropriate infrastructure, and the provision of a safe, secure environment. Such efforts must draw on the same variety of evidence-based practices that make effective emergency shelters successful: low-barrier service delivery, harm reduction, progressive engagement, motivational interviewing, and trauma-informed care. This housing-focused approach—which we call the GRACE model—offers real promise of meaningful reductions in homelessness, even for the most difficult to serve portions of the homeless population.

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9, 2016, meeting of the of the Empowerment Center Oversight Board (ECOB), the Dignity Village Program Manager noted that “at least two” people left the camp to take “below minimum-wage jobs,” but there is no indication that these individuals obtained housing in either the ECOB meeting minutes or the HMIS.

50. ORGCODE CONSULTING, INC., MOVING FROM MANAGING HOMELESSNESS TO A FOCUS ON ENDING HOMELESSNESS IN THE CITY OF GAINESVILLE AND ALACHUA COUNTY 2 (2016); Morgan Watkins, *Police Union, Officers Fret Over Lack of Rules at Dignity Village*, GAINESVILLE SUN (May 17, 2015), <https://www.gainesville.com/story/news/local/2015/05/18/police-union-officers-fret-over-lack-of-rules-at-dignity-village/31882210007/> (reporting police union's concern that Dignity Village “appears to be a magnet for a criminal element” engaging in “prostitution, drug sales [and] drug possession”).

51. See Watkins, *supra* note 50, at A1. See also CITY OF GAINESVILLE/ALACHUA COUNTY EMPOWERMENT CENTER OVERSIGHT BOARD, MINUTES OF MAY 13, 2015 MEETING 4 (noting law enforcement representatives' expressed concerns about ongoing violence at the camp and Gainesville Fire Rescue's request for law enforcement accompaniment when responding to calls).

52. Formally, the Alachua County Coalition for the Homeless and Hungry, Inc. (“ACCHH”). ACCHH was formed in 2002 as a coalition of service providers to fulfill a statutory role in developing a continuum of care plan and prioritizing grant applications. See FLA. STAT. § 420.624 (2019). It took on a direct service role in 2014 when no other agency stepped forward in response to the City of Gainesville's request for proposals to operate a one-stop service center and emergency shelter facility, to be called GRACE Marketplace, on the site of a former prison. See *infra* note 57.



### D. Roadmap: Gainesville's Tale of Two Tent Cities

The following sections of this Article provide a case study of Gainesville's experience. First, we briefly summarize the origins, evolution, and outcomes of Dignity Village, the designated "out of sight, out of mind" camping area established by the city.<sup>53</sup> Next, we describe the process by which Dignity Village was closed and replaced with a housing-focused temporary camping area on the campus of GRACE, the local low-barrier emergency shelter.<sup>54</sup> We then describe the successful housing outcomes achieved and the housing-focused practices through which the temporary camping area was eliminated by attrition.<sup>55</sup> Finally, we offer our concluding thoughts on the success of the project.<sup>56</sup>

## II. DIGNITY VILLAGE: EVOLUTION OF AN UNMANAGED CAMP

GRACE<sup>57</sup> opened in 2014 to address long-standing community needs related to homelessness and access to services.<sup>58</sup> The project brought together day services (including meals, laundry, bathrooms, and showers) and low-barrier emergency shelter services on the twenty-three acre campus of a former medium-security prison. GRACE operated with a housing first philosophy and partnered with more than a dozen agencies to provide a one-stop model of service delivery. Prior to that time, shelters in the community adhered to unproven "housing readiness" models, limiting access to those who could meet lengthy lists of eligibility requirements.<sup>59</sup>

Shortly after GRACE opened, city officials worked with a private landowner to shut down a 200-person encampment near the downtown area.<sup>60</sup> People were told, in essence, they couldn't stay there but could set up a tent near GRACE and

53. See discussion *infra* Part II.

54. See discussion *infra* Part III.

55. See discussion *infra* Part IV.

56. See discussion *infra* Part V.

57. The GRACE shelter and services campus took its name from Project GRACE, the City of Gainesville/Alachua County 10-Year Plan to End Homelessness. Sally J. Lawrence & Jon DeCarmine, *Project GRACE: The City of Gainesville/Alachua County 10-Year Plan to End Homelessness*, CITY OF GAINESVILLE & ALACHUA CNTY. BD. OF COMM'NS. (Dec. 15, 2005) (on file with the authors). The plan drew its name from a suggestion by a formerly homeless individual involved in the planning process, who proposed that the plan should reference "Gainesville Region/Alachua County Empowerment" or GRACE.

58. The campus itself, with no shelter component, opened to provide day services (restrooms, meals, referrals to other agencies, and transportation assistance) on May 5, 2014. Staff opened an unofficial outdoor shelter—The Pavilion—on June 8, 2014, and the first indoor shelter opened on October 1, 2014. See *Our History*, GRACE MARKETPLACE, <https://www.gracemarketplace.org/our-history> (last visited Apr. 14, 2023).

59. See, e.g., Carl McKinney, *St. Francis Gets Mostly Praise, Its Permit Renewed*, GAINESVILLE SUN (Mar. 27, 2014), <https://www.gainesville.com/story/news/local/2014/03/28/st-francis-gets-mostly-praise-its-permit-renewed/31862622007/> (noting requirements of police clearance and of performing substantial janitorial and maintenance tasks as conditions for receiving shelter).

60. See Monivette Cordeiro & Christopher Curry, *Homeless to be Evicted from Tent City*, GAINESVILLE SUN (July 8, 2014), <https://www.gainesville.com/story/news/local/2014/07/07/homeless-to-be-evicted-from-tent-city/31867683007/>.

have access to services.<sup>61</sup> Ultimately, the City's efforts recreated the tent city but added the basics of public health—clean water, bathrooms, and trash pickup.<sup>62</sup> Campers could walk 100 feet to GRACE for meals, showers, laundry, computers, medical services, and a dozen agencies ready to help.<sup>63</sup> For a while, it worked.<sup>64</sup> Touring the new camp in 2014, the authors noted the night and day difference between the new camp and prior unsanctioned encampments, both in terms of the cleanliness of the individual campsites and in terms of the self-care and self-respect evident in the individuals camping there. But with no resources dedicated to getting people into housing, people lived there for years.<sup>65</sup>

The new camp was informally christened “Dignity Village” by the first people who set up tents there.<sup>66</sup> The camp was not formally sanctioned until 2015, after city officials realized the need for someone to be accountable for what was happening at the camp.<sup>67</sup> Lacking any formal supervision, and after several lackluster attempts to facilitate self-governance,<sup>68</sup> the Dignity Village camp risked being overwhelmed by people who set up camp there specifically to prey upon the vulnerable people living there.<sup>69</sup>

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61. *Id.*

62. DIGNITY VILLAGE: REPORT AND RECOMMENDATIONS, *supra* note 47, at 2.

63. While the comprehensive list of services available at the GRACE one-stop campus has changed over the years and through the pandemic, the campus consistently offers access to providers helping with physical and mental health, benefit screening, legal assistance, veteran services, and more. See *Programs and Services*, GRACE MARKETPLACE, <https://www.gracemarketplace.org> (last visited Apr. 14, 2023).

64. See, e.g., Arupa Freeman, *The Best Situation We've Had for the Homeless*, GAINESVILLE SUN (Dec. 12, 2014), <https://www.gainesville.com/story/news/2014/12/15/arupa-freeman-the-best-situation-weve-had-for-the-homeless/31875648007/>.

65. See ORGCODE CONSULTING, INC., *supra* note 50, at 2 (noting that “[p]eople staying [in Dignity Village] are so resigned to their fate that some have clearly started to exert permanence on the land through elaborate structures and barricades to delineate space”). After assuming control of Dignity Village in 2015, the City of Gainesville failed to document any exits to permanent housing over the several years it managed the camp.

66. DIGNITY VILLAGE: REPORT AND RECOMMENDATIONS, *supra* note 47, at 2.

67. Morgan Watkins, *City Votes to Take Control of Dignity Village*, GAINESVILLE SUN (July 22, 2015), <https://www.gainesville.com/story/news/guardian/2015/07/22/city-votes-to-take-control-of-dignity-village/31123420007/> [hereinafter *City Votes to Take Control*].

68. DIGNITY VILLAGE: REPORT AND RECOMMENDATIONS, *supra* note 47, at 2. The Empowerment Center Oversight Board, on March 11, 2015, planned to discuss self-governance of the camp, among other issues, but meeting minutes indicate the discussion veered into a wide range of other issues instead, including trash pickup, access to showers, and whether officials should refer to Dignity Village as a “camp” or a “home.” Meeting minutes from City of Gainesville/Alachua County Empowerment Center Oversight Board (Mar. 11, 2015) (on file with authors). The last formal discussion of self-governance occurred at the March 9, 2016 ECOB meeting, at which the program manager noted he had “encouraged the residents to form their own self-governance model.” Steven Belk, *Dignity Village 90-Day Report*, Presentation to CITY OF GAINESVILLE & ALACHUA COUNTY EMPOWERMENT CENTER OVERSIGHT ADVISORY BOARD 6 (Mar. 9, 2016) (on file with authors).

69. See ORGCODE CONSULTING, INC., *supra* note 50, at 2 (noting “murmurs of human trafficking” at Dignity Village). See also Watkins, *supra* note 50 (reporting police union’s concern that Dignity Village “appears to be a magnet for a criminal element” engaging in “prostitution, drug sales [and] drug possession”).

The City assumed responsibility for the camp in 2015, hiring a program manager and stationing two police officers at the site in hopes of quelling the growing problems with violence, drugs, and predatory behavior.<sup>70</sup> But with no ability to control access,<sup>71</sup> no knowledge of who was staying out there,<sup>72</sup> and no organized system or staffing to facilitate exits to housing,<sup>73</sup> the site quickly grew out of control, swelling from a dozen campers to several hundred.<sup>74</sup>

A consultant in early 2016 noted that a walkthrough of Dignity Village was “devastating” and reported:

The catastrophe of the policy response to street homelessness is anything but a demonstration of dignity. The tents and makeshift shelters are one step removed from an overwhelming loss of life if there is ever a stiff wind and an open fire. Problematic substance use and drug dealing is rampant. Murmurs of human trafficking are hard to ignore. Conflict between people is exacerbated by the living conditions . . . . People staying there are so resigned to their fate that some have clearly started to exert permanence on the land through elaborate structures and barricades to delineate space.<sup>75</sup>

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70. See Betty Baker, *Update on Dignity Village*, CITY OF GAINESVILLE 22 (May 21, 2015), <https://gainesville.legistar.com/View.ashx?M=F&ID=3746538&GUID=16817134-E156-4E46-BDCD-F6FACE7C6EEF> (recommending immediate action by City Commission to address management of Dignity Village); *City Votes to Take Control*, *supra* note 67 (reporting City’s decision to assume direct management of Dignity Village); Morgan Watkins, *City Hall Will Be Open Five Days a Week*, GAINESVILLE SUN (July 28, 2015), <https://www.gainesville.com/story/news/guardian/2015/08/05/city-hall-will-be-open-five-days-a-week/31123154007/> [hereinafter *City Hall Will Be Open*] (reporting inclusion of funding for two patrol officers and project manager at Dignity Village in City’s approved tentative budget).

71. Dignity Village was located on a wooded, unfenced ten-acre parcel of land adjacent to the GRACE campus. Unrestricted access was possible from the road leading to the GRACE campus, from a utility easement to the east of the ten-acre parcel, and from a 1000-acre state forest to the southeast of the ten acre parcel. See DIGNITY VILLAGE: REPORT AND RECOMMENDATIONS, *supra* note 47, at 14, 17.

72. City staff repeatedly noted difficulties in developing an accurate roster of who lived in Dignity Village, in large part due to the transient population and lack of a single point of entry. At meetings of the Empowerment Center Oversight Board, staff provided an estimate of the number of people living in the camp based on a count of tents. See, e.g., Steven Belk, *Dignity Village Monthly Counts of Tents and People, May 2015 to October 2015*, Report submitted to the City of Gainesville/Alachua County Empowerment Center Oversight Board (October 7, 2015) (on file with authors). City staff eventually provided the first-ever roster of Dignity Village residents on August 8, 2019, five years after the camp opened and less than two months before it closed. See E-mail from Ferris Bates, Dignity Village Program Manager, to Jon DeCarmine, GRACE Exec. Dir. (Aug. 8, 2019, 11:18 AM) (on file with authors).

73. Staffing of Dignity Village by the City of Gainesville was limited to a 40-hour per week site manager and regular police presence. See *City Hall Will Be Open*, *supra* note 70. The city did not document any exits from Dignity Village in the Homeless Management Information System (HMIS) database; indeed, Dignity Village was not identified as a project in the HMIS database until GRACE took on housing engagement responsibilities for Dignity Village residents in 2019. See *infra* Part III.

74. An accurate roster of Dignity Village residents in 2019 identified 222 residents. See *infra* Part III.A.1. A report in April, 2015 indicated that “180 persons live on the site, with new people arriving on a regular basis.” DIGNITY VILLAGE: REPORT AND RECOMMENDATIONS, *supra* note 47, at 3.

75. ORGCODE CONSULTING, INC., *supra* note 50, at 2.

Clearly, this first attempt at a sanctioned encampment had failed. Police and paramedics were responding to the camp more than 100 times a month.<sup>76</sup> Program managers could not point to any data showing the camp had changed anyone's homelessness status.<sup>77</sup> In fact, the sparse data available seemed to indicate that the presence of Dignity Village was making things worse: local point-in-time data in 2018 found that 54% of the unsheltered homeless population was chronically homeless, double the state and national average.<sup>78</sup> People who may have been homeless for a short time previously were instead setting up camp in Dignity Village and remaining there for years, leading to exacerbated substance abuse and mental health problems, physical health problems, and staffing issues at the nearby emergency shelter.<sup>79</sup> In addition, GRACE staff concluded that the presence of the encampment right outside their gates made it more difficult to motivate program participants to work on a housing plan when they could easily set up camp next door at the low-demand, alcohol-friendly encampment.<sup>80</sup>

By 2019, city and county officials agreed to a plan proposed by GRACE to close the camp in a way that had never been done before. For years, communities across the country had closed encampments through aggressive policing and land clearing, often giving campers less than a day to break camp and move their belongings.<sup>81</sup> GRACE's new closure model called for a safe, managed environment for the residents to move to on a temporary basis, while advocates worked individually with campers to find appropriate permanent housing.<sup>82</sup> At the time

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76. Gainesville Police Department, *Grace Marketplace and Dignity Village*, Report to City of Gainesville/Alachua County Empowerment Center Oversight Advisory Board (May 13, 2015) (reporting 433 calls for service between January 1 and April 15, 2015) (on file with authors).

77. See *supra* note 65 and accompanying text.

78. Press Release, Jon DeCarmin, 2018 PIT Results Press Release (Apr. 25, 2018) (on file with authors). See also Statements by Jon DeCarmin to Joint Alachua County/City of Gainesville Commission Meetings, at 2:18:15-2:29:35 (Dec. 10, 2018), <https://alachua.granicus.com/player/clip/3847> [hereinafter Dec. 10 Meeting]; Statements by Jon DeCarmin to Joint Alachua County/City of Gainesville Commission Meetings, at 1:08:23-1:35:17 (May 6, 2019), <https://alachua.granicus.com/player/clip/3975> [hereinafter May 6 Meeting].

79. Letter from Erin Wixsten, Associate, OrgCode Consulting Inc., to Jon DeCarmin (Dec. 9, 2018) (on file with authors).

80. See *id.* at 1 (“Dignity Village is a problem . . . Unfortunately, the staff and Leadership at Grace have been essentially forced to mitigate and absorb this problem. Impacts to service delivery and operations for the shelter staff and certainly guests at Grace Marketplace have taken the brunt of this. It is ridiculous to assume that the staff can provide intensive, housing focused services to shelter guests, while at the same time being constantly called to respond to the varying needs of the residents of Dignity Village throughout the day-service delivery.”). See also Dec. 10 Meeting, *supra* note 78, at 2:18:15-2:29:35; May 6 Meeting, *supra* note 78, at 1:08:23-1:35:17.

81. See *supra* notes 10–12 and accompanying text.

82. The plan was initially proposed by GRACE in 2017 in response to a Request for Proposal to manage camping at Dignity Village. See *Alachua County Coalition for the Homeless and Hungry, Inc.*, Response to City of Gainesville RFP#: CMGR-1800019-GD (Aug. 29, 2017) at 33–37 (on file with authors). GRACE proposed “to manage homeless camping at Dignity Village by putting an end to it” and to establish “a transitional low-barrier tent camping area” on the GRACE campus for the Dignity Village residents. *Id.* at 33. The plan, discussed in detail in Part III below, focused heavily on resident input and housing engagement and created a phased approach that offered temporary accommodations in a safe camping area that was designed to be closed through attrition as appropriate permanent housing

the closure was announced, GRACE's Executive Director noted, "There are hundreds of people out there in Dignity Village who have lived there for years and there's really been no attempt to get them off the street. The plan that GRACE has put forward looks at ways we can engage those individuals to find permanent housing for them and to find the best possible solution that doesn't involve leaving them sleeping in a tent outside."<sup>83</sup>

In only five years, Dignity Village had become the biggest broken piece of the community's housing crisis response system, consuming scarce public resources and generating frequent headlines that risked turning public sentiment against future efforts to help people without housing.<sup>84</sup> Originally conceived of as a well-intentioned "out of sight, out of mind" solution, it became a toxic environment that exacerbated the difficulties of getting people into housing, and functioned essentially as a tool to keep the majority of unsheltered people away from downtown.

### III. GRACECAMP: THE HOUSING ENGAGEMENT ALTERNATIVE

As the community came to terms with the failure of its first sanctioned camp, local advocates pushed a new proposal that would reimagine the camp as one focused on ending, and not just managing, homelessness. In this model, the safe camp was not an end in itself but rather a transitional facility to accommodate Dignity Village residents temporarily as advocates worked to get them into appropriate housing. With the need to close Dignity Village apparent, advocates set out

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was found for the individuals camping there. *Id.* at 33–37. Ultimately, GRACE secured local government approval and funding of the plan in May 2019. For a discussion of the advantages and disadvantages of closing the safe camping area through attrition rather than making it a permanent resource in the local effort to address homelessness, see *infra* note 115.

83. Francesca Stewart, *Dignity Village to Close by Beginning of Next Year*, WCJB TV20 NEWS (May 8, 2019), <https://www.wcjb.com/content/news/Dignity-Village-to-close-by-beginning-of-next-year-509661651.html>; see also Deborah Bowie & Jon DeCarmine, *Dignity Village Closure Sees Initial Success*, GAINESVILLE SUN (Mar. 6, 2020), <https://www.gainesville.com/story/opinion/columns/more-voices/2020/03/11/dignity-village-closure-sees-initial-success/1545677007/> (noting successful efforts to engage with and find housing for former Dignity Village residents).

84. See, e.g., Arek Sarkissian, *Two Arrested After Violent Crimes at Dignity Village*, GAINESVILLE SUN (Apr. 16, 2015), <https://www.gainesville.com/story/news/crime/2015/04/16/two-arrested-after-violent-crimes-at-dignity-village/31129085007/>; Watkins, *supra* note 50; Cindy Swirko, *2 Officers, One Resident Hurt in Disturbance at Dignity Village*, GAINESVILLE SUN (July 14, 2015), <https://www.gainesville.com/story/news/crime/2015/07/15/2-officers-one-resident-hurt-in-disturbance-at-dignity-village/31129798007/>; Cindy Swirko, *Arrests Made In Dignity Village Disturbances*, GAINESVILLE SUN (Nov. 25, 2016), <https://www.gainesville.com/story/news/crime/2016/11/25/arrests-made-in-dignity-village-disturbances/24477130007/>; Deborah Strange, *Nude Woman Arrested at Dignity Village*, GAINESVILLE SUN (Dec. 15, 2016), <https://www.gainesville.com/story/news/crime/2016/12/15/nude-woman-arrested-at-dignity-village/24250018007/>; Daniel Smithson, *GPD: Man Says he 'Whopped' Dignity Village Resident 'Good,'* GAINESVILLE SUN (Apr. 13, 2018), <https://www.gainesville.com/story/news/crime/2018/04/13/gpd-man-says-he-whopped-dignity-village-resident-good/12708406007/>; The Gainesville Sun Editorial Board, *It is Time to Close Dignity Village*, GAINESVILLE SUN (Dec. 7, 2018), <https://www.gainesville.com/story/opinion/editorials/2018/12/09/editorial-it-is-time-to-close-dignity-village/6740804007/>.

to answer the key question left unanswered by previous campsite closures and sweeps across the country: “If I can’t stay here, where else can I go?”<sup>85</sup>

The answer to this key question was to create a temporary managed campground on the GRACE campus where Dignity Village residents could go when the Dignity Village encampment was closed. Housing-focused case management would then be provided to assist the GRACECamp residents into permanent housing. Thus, the overarching vision encompassed two phases. In the first phase, the temporary on-campus campground would be created, Dignity Village would be fenced off and closed, and the Dignity Village residents would move into the on-campus campground. In the second phase, the temporary on-campus campground would be reduced in size and ultimately eliminated, as the former Dignity Village residents moved into housing.

To operationalize the first phase of the plan, advocates approached the project on two fronts. They worked to establish a safe, managed campground that would provide people a safe place to go after Dignity Village closed. At the same time, they worked with Dignity Village residents and City officials to implement a humane closure procedure that prioritized communication with residents and coordination with local government, other service providers, and the Continuum of Care. This work occurred simultaneously over the six months prior to the closure of Dignity Village.

The sections below describe, first, the work done in Dignity Village to prepare for the closure, and the work done on the GRACE campus to develop the new, managed campground. Following that, this Article outlines how housing-focused case management and outreach was used to house the former Dignity Village residents and close the new, managed campground through attrition.

### *A. Phase One: Closing Dignity Village and Creating GRACECamp*

#### *1. Work in Dignity Village*

Advocates wanted to avoid the mistakes made in other camp closures. Those mistakes led to people scattering from the about-to-be-closed camp to other smaller camps in the community, unable to be found by the people working to get them into housing.<sup>86</sup> The first step, then, was to get the people living in Dignity Village involved in the planning process for what was to come next.

Beginning in May 2019, staff met at least twice a month with Dignity Village residents to make sure they knew the camp would close in phases beginning in October of that year. Throughout these meetings, advocates heard consistently that the free-wheeling atmosphere of the former camp was *not* something they valued. Rather, they wanted to have the same basic protections people in the housed community could enjoy: a place where they could get a good night’s sleep and leave without fear of their belongings being stolen while they were away.

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85. See, e.g., Dec. 10 Meeting, *supra* note 78, at 2:18:15-2:29:35; May 6 Meeting, *supra* note 78, at 1:08:23-1:35:17.

86. See NAT’L LAW CTR. ON HOMELESSNESS AND POVERTY, *supra* note 7.

They wanted the relatively small number of people who created dangerous situations for other residents to be evicted from the camp, and they wanted to have some say in the basic requirements of the new camp.

Next, it was essential to establish an accurate roster of who was living in the Dignity Village camp. Over the years, informal attempts had been made to understand who lived there, but these efforts were hampered by inadequate staffing and a lack of control over who came and went. While the City had hired a full-time project manager, that person worked 40 hours a week to supervise a site that was open 24 hours a day, seven days a week. When the project manager left for the day, new tents popped up on site, and very often there were more residents living at Dignity Village the next morning than there had been the day before.

To establish an accurate roster, GRACE dedicated four outreach workers to roam the camp from early morning hours until late each night. The ten acre camp was split into seven zones, with outreach workers focused on individual zones for about a week at a time until daily counts of campers and tents consistently matched the roster of names. At the same time, the City installed fencing around the camp to create a single point of entry and exit that could be monitored. Individuals attempting to set up camp for the first time in Dignity Village were notified of its pending closure and redirected to the adjacent emergency shelter. At the end of the eight-week effort, outreach workers had identified 222 people living in the camp.

Working through each zone, outreach teams began to assemble the first demographic profile of the people living in Dignity Village (Table 1, below).<sup>87</sup> While many in the community had assumed that 100% of campers were chronically homeless, this profile revealed that only 93 of 222 (41.8%) met the definition of chronic homelessness.<sup>88</sup>

These numbers show a population far less “chronic” than initially thought. In many places, this perception of high rates of chronic homelessness status may have warded off some attempts at interventions due to a perceived lack of resources for these individuals and the perceived difficulty of addressing their needs.<sup>89</sup> Still, the available data showed a community of people who had extensively—and

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87. Slack Message from Patrick Kelly, GRACE Data Quality & System Improvement Coordinator, to Jon DeCarmine, GRACE Exec. Dir. (February 24, 2022, 10:38 AM) (on file with authors).

88. Slack Message from Patrick Kelly, GRACE Data Quality & System Improvement Coordinator, to Jon DeCarmine, GRACE Exec. Dir. (February 23, 2022, 3:18 PM) (on file with authors). Initially, the HMIS data showed only 46 of 222 (20.7%) met the criteria for chronic homelessness. Slack Message from Patrick Kelly, GRACE Data Quality & System Improvement Coordinator, to Jon DeCarmine, GRACE Exec. Dir. (February 21, 2022, 5:02 PM) (on file with authors). However, local Homeless Management Information System (HMIS) data had been notoriously bad at establishing chronic homelessness rates for the community. In particular, the lack of regular engagement with unsheltered people, especially those in Dignity Village, meant that gaps frequently existed in the data required to make this determination. As outreach workers began to fill in these gaps, a clearer picture emerged of chronic homelessness status.

89. While the data revealed an incomplete picture of chronic homelessness status, it bears mention that Dignity Village clearly created a momentum *toward* chronic homelessness. Repeatedly,

unsuccessfully—attempted to engage with the existing homeless services system. Two out of three had previously stayed in local emergency shelters.<sup>90</sup> Fifty-six percent had been homeless more than once.<sup>91</sup> And in terms of barriers to housing and supports, less than half reported income (46%), non-cash income like food stamps (45%), or health insurance (26%).<sup>92</sup>

TABLE 1: ROSTER DEMOGRAPHICS OF PEOPLE LIVING IN DIGNITY VILLAGE

<b>RACE</b>	<b>NUMBER OF CAMPERS</b>	<b>PERCENT (%) OF TOTAL CAMPERS</b>
White (HUD)	146	66%
Black, African American, or African (HUD)	73	33%
American Indian, Alaska Native, or Indigenous (HUD)	2	1%
Native Hawaiian or Pacific Islander (HUD)	1	0%
<b>ETHNICITY</b>	<b>NUMBER OF CAMPERS</b>	<b>PERCENT (%) OF TOTAL CAMPERS</b>
Non-Hispanic/Non-Latin(a)(o)(x) (HUD)	213	96%
Hispanic/Latin(a)(o)(x) (HUD)	7	3%
Null	2	1%
<b>AGE</b>	<b>NUMBER OF CAMPERS</b>	<b>PERCENT (%) OF TOTAL CAMPERS</b>
20–29	20	9%
30–39	49	22%
40–49	39	18%
50–59	62	28%
60–69	42	19%
70–79	10	5%

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individuals who shelter staff could have housed relatively quickly became established in Dignity Village and this resulted in increasing their length of homelessness past the one-year mark.

90. Slack Message from Patrick Kelly, GRACE Data Quality & System Improvement Coordinator, to Jon DeCarmine, GRACE Exec. Dir. (Mar. 1, 2022, 4:45 PM) (on file with authors) (reporting 143 individuals with previous shelter stays out of 222 persons on the DV Roster).

91. Slack Message from Patrick Kelly, GRACE Data Quality & System Improvement Coordinator, to Jon DeCarmine, GRACE Exec. Dir. (February 21, 2022, 5:02 PM) (on file with authors) (reporting 100 out of 178 respondents specifying more than one time homeless).

92. Slack Message from Patrick Kelly, GRACE Data Quality & System Improvement Coordinator, to Jon DeCarmine, GRACE Exec. Dir. (February 21, 2022, 10:34 AM) (on file with authors) (reporting 103, 99, and 58 individuals with income, non-cash benefits, and health insurance, respectively).



<b>GENDER</b>	<b>NUMBER OF CAMPERS</b>	<b>PERCENT (%) OF TOTAL CAMPERS</b>
Male	153	69%
Female	65	29%
Female, Transgender	2	1%
A gender other than singularly male or female (note: current reports record this as “No Single Gender”)	2	1%
<b>VETERAN STATUS</b>	<b>NUMBER OF CAMPERS</b>	<b>PERCENT (%) OF TOTAL CAMPERS</b>
Yes	17	8%
No	205	92%
<b>VICTIM OF DOMESTIC VIOLENCE</b>	<b>NUMBER OF CAMPERS</b>	<b>PERCENT (%) OF CAMPERS OF THAT GENDER</b>
<i>Yes (HUD)</i>		
Male	7	5%
Female	29	45%
A gender other than singularly male or female (note: current reports record this as “No Single Gender”)	1	50%
<i>No (HUD)</i>		
Male	144	94%
Female	36	55%
Female, Transgender	2	100%
A gender other than singularly male or female (note: current reports record this as “No Single Gender”)	1	50%
<i>Null</i>		
Male	1	1%
<i>Client Refused (HUD)</i>		
Male	1	1%
<b>DISABILITY STATUS</b>	<b>NUMBER OF CAMPERS</b>	<b>PERCENT (%) OF TOTAL CAMPERS</b>
Yes (HUD)	137	62%
No (HUD)	78	35%
Null	5	2%
Client Refused (HUD)	2	1%

At this point, GRACE coordinated with other outreach workers and staff from the local Continuum of Care (CoC) to ensure each person on the roster had been triaged and placed on the community's coordinated entry by-name list. At the start, fewer than 70% of individuals on the roster appeared on this list.<sup>93</sup> Teams that included outreach staff, CoC staff, and veteran service organizations went into the camp every two weeks to assess each individual's depth of need.<sup>94</sup> Meanwhile, GRACE staff dropped GIS pins at each tent site on a Google Map to begin to get a sense of who lived in each zone of the camp. Staff updated the map regularly so clicking on the location of a tent revealed the occupant's name, photo, information on pets, other storage tents linked to the campsite, and more.

This effort helped clarify the housing needs of people living in Dignity Village for the first time and helped the community understand the housing interventions that would be most appropriate for the people living there. By August 2019, triage data revealed that half of the people on the roster would be best served by permanent supportive housing, while rapid rehousing resources would be most appropriate for another 40%. Overall, only one in ten people were expected to resolve their homelessness on their own.

This work dovetailed with the effort to establish a safe, managed camp on the GRACE campus, and to set it up in such a way that residents wanted to move in. To that end, staff worked with residents to shape the policies, protocols, expectations, and layout of the new camp.

Staff met with residents twice a month in Dignity Village to make sure those who would be affected by the closure knew what was happening and to create opportunities to discuss the development of the new GRACECamp. These meetings covered the layout and setup of the camp, basic expectations, admissions criteria, how staff would respond to conflicts, and other areas related to camp infrastructure.

The meeting format mirrored a quality-improvement process between staff and residents. For each topic, staff presented ideas to residents for suggestions. Staff then incorporated resident feedback to refine the plan and presented the modified proposal two weeks later. The look and feel of the new camp slowly came into focus, reflecting the wants and needs of the people who would live in the new camp. Through this iterative process, the initial proposed setup evolved to include:

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93. See E-mail from Jon DeCarmine, GRACE Exec. Dir., to Claudia Tuck, Alachua Cnty. Dir. of Cmty. Support Servs., and Mona Gil de Gibaja, United Way of N. Cent. Fla. President & CEO (Aug. 21, 2019, 12:25 PM) (on file with authors).

94. At the time, these outreach teams used the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) developed by OrgCode Consulting to assess depth of need. Our community (and many others) has since developed a greater understanding of racial equity issues associated with use of this tool, and we are now engaged in the collective work of finding or developing a more appropriate, equitable triage tool to determine housing interventions.

- A circular layout allowing campers to have a clear line of sight to their tent from anywhere on the site.
- Guidelines to allow safe use of fire pits for cooking.
- A tentative policy allowing storage of food and medicines in personal coolers, with a shared understanding that the policy would change if rodents or other pests became a problem.
- A dedicated section of the camp for people using scooters, wheelchairs, or walkers. This section sat adjacent to existing paved sidewalks to ensure people with limited mobility could access their tents without having to leave paved walkways.
- Co-ed sleeping arrangements that would allow couples to sleep in the tent assigned to one person while using the tent assigned to the other person for storage.
- Accommodations for short- and long-term storage of belongings people had amassed during their stay at Dignity Village.

## WHAT'S HAPPENING IN DIGNITY VILLAGE?



On January 1, 2020, Dignity Village will be closed and replaced with a temporary campground on the GRACE campus while we work to connect everyone with affordable housing. We're still working out final details, and we need your input on:



- How the campground will be set up
- How to support people with pets
- How to make sure people are safe
- How to get you back into a safe place to call home as quickly as possible



Please join us to learn about these changes, and help us create a plan that works for YOU!

**THURSDAY, MAY 30 at 10 AM**  
**DIGNITY VILLAGE TRAINING BLDG**

Staff worked through a range of program designs with residents to determine how likely they would be to move onto the new, housing-focused safe camp. If staff kept the expectations the same as in the existing low-barrier shelter, about 50% of residents said they would move in. When told suggested policies could be changed to accommodate single adults and their partners, nearly 60% of people said they would move onto the new site. When staff offered to make accommodations for not only the people in the camp, but their pets as well, the number of individuals interested in moving to the new location jumped to 65%.

At the end of every meeting, staff surveyed residents to determine whether they had enough information to make a decision about what they wanted to do, whether they felt they were being respected in the process, and what they ultimately wanted to do. Across each dimension, residents reported that they either “agreed” or “strongly agreed” that (a) they had a good understanding of the process, (b) they felt supported by GRACE in making their decision, (c) they felt

respected throughout the process, and (d) they felt like the pending changes would improve their living conditions.<sup>95</sup>

After months of resident engagement and consistent, accountable follow-up, staff and residents together created a plan for GRACECamp that would be safe, well-managed, and accompanied by the same housing-focused services provided in GRACE's low-barrier emergency shelter. Staff then began the work of implementing that shared plan on a five-acre parcel on the GRACE campus, adjacent to the Dignity Village site residents would be moving from.

This preliminary work with Dignity Village residents helped staff clarify what would be provided at the new, temporary campground and laid the groundwork for closing the Dignity Village encampment without arrests. The following sections describe the collaborative process that informed the design of GRACECamp's physical setup and campground expectations and the co-operative efforts between the City and GRACE staff that succeeded in closing Dignity Village without arrests. The remaining key aspect of this initial phase of the project—housing engagement work—is covered below in Section III.B.

## 2. GRACECamp Setup

Dignity Village had been prone to flooding throughout its five-year history, with standing water sometimes remaining for weeks after hurricanes and major storms. The new campground would include raised ten-foot by ten-foot tent platforms to ensure tents and possessions stayed dry. GRACE partnered with the City of Gainesville, the Home Depot Foundation, and Rebuilding Together of North Central Florida to purchase the materials for and construct 120 tent platforms on the five-acre parcel, loosely arranged in a circle as requested by the people who would live there.<sup>96</sup>

Platforms included two-by-four posts at each corner to allow the installation of shade sails over each tent. To address one of the primary problems in Dignity Village—unregistered campers setting up when staff was not present—GRACE provided new, identical tents to each person moving in. With 120 identical tents set up, staff could easily identify new tents that did not match the others. Platforms were spaced at least three feet apart to create a fire break in the event of

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95. Average scores across the five monthly meetings show residents had a good understanding of the changes that were taking place (8.2/10), believed the coming changes would improve their living conditions (7.6/10), felt supported in the process (7.6/10), and felt respected by the staff developing the new camp (8/10). Jon DeCarmine, GRACE Exec. Dir., DV Survey Results (last modified Nov. 22, 2021) (unpublished survey) (on file with authors).

96. Jon DeCarmine, GRACE Exec. Dir., GRACECAMP Site Plan (last modified Feb. 25, 2020) (unpublished site plan) (on file with authors). Although the roster initially included 222 individuals eligible to move onto the GRACECamp site, staff anticipated that 120 tent sites would be sufficient, given that surveys of the residents suggested that only half or two-thirds would move onto GRACECamp, and that some reduction in the roster occurred while Dignity Village was still open. In the end, only about two-thirds of the 120 tent sites were actually needed. *See infra* note 106 and accompanying text.

a tent fire, and residents were told they could not have any belongings in the gap between platforms.

While the existing emergency shelter campus had toilet and shower facilities already in place, staff added six additional portable toilets on the new campground, half of which were accessible by wheelchair, to accommodate the new residents. The City laid a lime rock roadway through the center of the new camp to allow access by emergency vehicles in the event of a fire. Fire extinguishers were hung from posts throughout the camp, and fire rings were installed in common areas with at least twenty-five feet between each ring and the closest tent.

### 3. GRACECamp Expectations

Using the iterative process described above, staff and residents agreed that the campground would have essentially the same low-barrier expectations that applied to the emergency shelter campus. These expectations, posted throughout the campus, focused primarily on those things that would promote health, safety, and well-being on the campus, including the following:

1. Please respect the rights, property, and peace of everyone here.
2. Drugs, alcohol, and weapons are not permitted on campus.
3. Physical or verbal violence and threats are not permitted.
4. We do not allow gambling, sexual activity, or unwanted physical contact.
5. Personal property can only be stored in assigned areas.
6. Please leave all spaces cleaner than you found them.
7. We require that all guests work toward their housing plan while utilizing shelter/safe camp resources.

While most of the GRACECamp expectations remained identical to expectations for the shelter, an adjustment was made regarding the policy prohibiting alcohol. Meetings with and surveys of the Dignity Village residents made it clear that a key decision point for many campers hinged on access to alcohol, which was allowed in the Dignity Village camp. After extensive discussion, staff agreed to a “don’t ask, don’t tell” policy on the possession of alcohol inside of the GRACECamp tents. In essence, tents would be treated as a private bedroom with no staff access to this personal space unless there was a clear risk to health and safety. Staff also required residents of the new campground to sign and adhere to transitional campground expectations that laid out the requirement that guests work with staff, to the best of their ability, on a housing plan.<sup>97</sup> These expectations mirrored the housing expectations of the low-barrier emergency shelter with modifications made as appropriate to accommodate the open-air setup of the campground. The expectations included guidance on the storage of personal

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97. See *infra* App. A for GRACECamp expectations.

belongings, frequency of contact with housing staff, and accommodation of animals.

Staff incentivized early commitments to move onto the campus by allowing individuals to choose their future campsite when they registered. The sooner campers signed up to occupy a site, the more likely they could choose their platform based on location and proximity to (or distance from) other campers.

In the month leading up to the closure, staff aimed to move three to four residents a day from Dignity Village to the new campground. Move-in dates were scheduled to fit the schedules of campers, and staff provided help loading, moving, and unloading possessions using trailers, box trucks, and pickup trucks. Through this process, the new campground grew gradually, in a controlled fashion, allowing staff to test staffing levels and supervision of the new site over time, rather than moving up to 120 people onto the new site all at once.

In the weeks leading up to the move, staff led individual Dignity Village residents through a “trash or treasure” exercise with their belongings.<sup>98</sup> While some space could be provided for belongings on the new campground, many campers had accumulated belongings over the past five years that would not fit. Residents worked with staff to classify their belongings into three broad categories: (1) important belongings that the person would bring with them into their new tent, provided they would fit within the tent itself or the “front yard” of the tent platform; (2) important belongings that would be placed into long-term storage, accessible once a month (for items that would not be needed while on the new campground, but might hold sentimental value, or be useful when moving into housing); and (3) items that were no longer needed and could be disposed of. Staff purchased stackable bins for long-term storage, and each resident was allocated roughly 200 cubic feet of space for these items. To prevent the spread of bed bugs and other pests from items that had been outside for months or more, no furniture or bedding from Dignity Village was allowed either in storage or on the new campground.

#### 4. Closing Dignity Village Without Arrests

With the campground infrastructure and expectations in place, the final piece of the puzzle was collaborating with local law enforcement and City officials to manage the actual closure of Dignity Village.<sup>99</sup> To address this, GRACE developed a closure procedure that coordinated the response of outreach workers with law enforcement and City public works staff.

The closure procedure<sup>100</sup> clearly described timelines for notifying residents and how and when those notices would be given. More critically, it laid out the

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98. Similarly, the city of Charleston, West Virginia included a “sorting exercise” to separate items of value from other belongings as part of its required procedures for clearing homeless encampments. See TENT CITY, USA, *supra* note 23, at 110–12.

99. See *id.* at 42 (stating guiding principles and best practices for encampment closures, including that “[a]ny move or removal of an encampment must follow clear procedures that protect residents”).

100. See *infra* App. B.

community response in the event that some individuals refused to leave Dignity Village at the time of closure. The procedure clearly defined the roles of each project partner while ensuring the role of outreach workers stayed within the realm of social and supportive services. That is, staff working directly with residents would have no role in any enforcement action that occurred. Instead, those staff members would position themselves as allies of residents while working to mitigate or altogether eliminate the need for law enforcement involvement in the closure. The Gainesville City Commission, sitting as the General Policy Committee, approved this closure procedure unanimously in May 2019. When the closure finally occurred in March 2020, there was only one camper who had not vacated the property. Using the approved procedures established in advance, outreach workers coordinated with city officials to avoid arrest and help move the camper onto the new campground. Thus, the Dignity Village encampment was closed with zero arrests. Moreover, for each and every resident who remained in the community, staff had a clear understanding of where to find them—GRACECamp or elsewhere—and could continue working with them to secure housing.

### *B. Phase Two: Housing the Residents and Closing GRACECamp*

Though the initial vision for the project contemplated that Dignity Village residents would first be moved onto the GRACE campus and then be housed, in practice the housing engagement process began immediately, before Dignity Village was closed. Outreach workers were able to connect 64 individuals with housing directly from Dignity Village even before GRACECamp opened. The following sections describe the housing engagement process, first in Dignity Village, and then in GRACECamp.

#### 1. Initial Engagements in Dignity Village

Even before Dignity Village was closed, GRACE worked to develop a housing engagement process that would ensure each person moving onto the new campground would have a dedicated housing specialist. With 120 people anticipated to move onto the new campground, GRACE hired four housing specialists to provide case management services to campers with a target caseload of 30 people per staff member. Existing GRACE staff members filled these new positions due to their already formed relationships with Dignity Village campers as they used the campus for meals, showers, and other day services. Given the uncertainty of how each person could best be served and where they would ultimately set up camp, these positions functioned as a hybrid of case management, outreach specialists, and diversion specialists. These hybrid positions allowed for housing engagement of all former Dignity Village residents, including those who declined a site at the new campground and instead chose to set up camp elsewhere in the community.

Substantively, the housing engagement process mirrored the approach used by outreach teams for unsheltered people elsewhere in the community with an

initial emphasis on rapport building before structuring interactions to make progress toward housing. The team placed an initial emphasis on document readiness. Due to this initial engagement in Dignity Village, the vast majority of people setting up on the new, managed campground were document-ready—that is, in possession of identification and other legal documents needed to sign a lease—by the time they arrived.

Throughout the process, outreach teams placed a strong emphasis on providing a variety of housing options to best meet people’s stated needs. In ongoing conversations, staff inquired about preferred housing accommodations (i.e. living alone vs. shared housing), desired (or undesired) neighborhoods, infrastructure needs (e.g., a first floor unit, a yard for pets), and more. Wherever possible, participants were presented with a range of housing options meeting these criteria.<sup>101</sup>

After a unit was selected, staff accompanied the resident to sign the lease, tour the unit, and orient them to services and transportation options available in the neighborhood. At move-in, staff helped pack up the campsite, including items in long-term storage, and delivered these items to the unit. GRACE maintains a supply of donated furniture and household items, and participants “shopped” for these free items to supplement their own belongings. These items were loaded into a box truck and delivered to the unit.

Initially, staff focused their efforts on housing as many people as possible over the six-month period while Dignity Village was still open to existing residents, but fencing and security staffing ostensibly prevented<sup>102</sup> new campers from moving into the camp.<sup>103</sup> From October 2019 through February 2020, staff moved 64 people into housing, including 24 people diverted from homelessness and housed with friends and family.<sup>104</sup>

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101. We note that the goal of providing a range of housing options, in practice, did not always lead to situations where people had the array of choices they deserved. Often, the realities of affordability, access to bus routes, and amenities created situations where people had to choose between just one or two available units.

102. Despite the best efforts of GRACE and City staff to prevent people from setting up new sites in Dignity Village after the roster had closed, advocates identified sixty-seven individuals who had been living in Dignity Village after the roster was finalized. ACCHH, *DIGNITY VILLAGE OVERFLOW SHELTER HMIS ESG CAPER REPORT* (last accessed Mar. 15, 2023) (unpublished report) (on file with authors). This indicates that they had set up camp between October 2020 and February 2020, and would not be included on the final roster. GRACE set up a temporary overflow shelter in an empty building to accommodate these individuals as they waited for an alternative place to stay. Two of these individuals were diverted permanently and one was housed with no ongoing subsidy. Forty-seven others were ultimately moved into the emergency shelter, and fifteen set up camp elsewhere in the community. Of the three remaining people, one individual died in the hospital during this time, one was incarcerated, and one left for a long-term medical care facility.

103. Once fencing and staffing to prevent new entries were in place, GRACE staff put in place a soft prioritization for people who arrived with the intent of camping in Dignity Village. In these cases, staff first attempted to divert individuals to alternative accommodations, and then offered a shelter bed to the prospective camper.

104. ACCHH, *DIGNITY VILLAGE HMIS ESG CAPER REPORT* (last accessed Mar. 15, 2023) (unpublished report) (on file with authors). Staff tracked the success of these diversions at 90, 180, and 365 days through follow-up phone calls to the person who had originally agreed to let the person move in with them, or by contacting the diverted individual directly. Nearly three out of four individuals diverted



In addition to the 24 diversions, advocates supported another 40 individuals as they moved into permanent housing during this phase. The Continuum of Care's dynamic prioritization<sup>105</sup> of Dignity Village residents started at the beginning of this first phase, on October 1, 2019. The use of dynamic prioritizations helped to connect ten individuals with permanent housing (three to permanent supportive housing (PSH), and seven to Rapid Rehousing (RRH)) during this phase.

Notably, the majority of exits from homelessness in this initial phase required little to no ongoing support. On the contrary, 25 individuals moved directly into rental units with no ongoing subsidies, instead requiring only nominal one-time supports like assistance with first- and last-month's rent, security deposits, or back utility balances. The average cost of these one-time supports was less than \$1,500 per person. The dramatic success of housing engagement, even among a population historically considered to be the "hardest to serve," clearly demonstrates the value of housing-focused outreach and engagement efforts and shows that substantial success can be achieved even without ongoing housing support.

## 2. Engagements on the Managed Campground

Following the initial success while Dignity Village remained open, outreach workers shifted their focus to the new, managed campground as the closure date neared and more people moved onto the GRACE campus.<sup>106</sup> There, housing specialists—the same people who had served in previous weeks as outreach staff in the original camp—had daily interactions with almost everyone on the new campground, though not all of these interactions were focused directly on housing. However, even in non-housing conversations, housing specialists looked consistently for opportunities to resolve the person's homelessness. For example, the staff was trained on how to facilitate diversions, but often the first step was to talk

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from Dignity Village (73%) remained stably housed after 90 days. After 180 days, 68% remained stably housed, with just over 1 in 4 (27%) returning to homelessness within Alachua County. At 365 days, more than half remained housed. Of note, at the one-year mark, nearly a third of people diverted could no longer be contacted, though HMIS records show they did not return to homelessness in the five-county CoC region.

105. Dynamic prioritization is a HUD-approved tool that allows communities to make the most efficient use of their housing resources. Ordinarily, housing resources are prioritized by allocating them to the most vulnerable individuals in the community. Dynamic prioritization allows a community to add other factors, such as an applicant's geographic location, in allocating its housing resources. *See infra* note 108 and accompanying text.

106. At the time Dignity Village finally closed in March 2020, 131 people remained on the roster. Eighty individuals set up camp at the new site. Nineteen chose to set up camp elsewhere in the community, a vast improvement over the high percentage who could reasonably be expected to become homeless elsewhere had no alternative campground been available. Over the next 90 days, dozens of others were removed from the roster as HMIS records showed they had not received any homeless services from that point forward. Thus, while the roster officially included 131 individuals at the time Dignity Village was closed in March 2020, only 99 individuals actually remained. The others had left the area in the weeks before the closure and were officially removed from the roster when 90 days passed from their last receipt of services. *See infra* note 111 and accompanying text.

through ways a person might be able to mend relationships with friends and family. Many conversations used motivational interviewing to support personal decision making, with an emphasis on problem solving, emotional support, and steering the conversation toward finding and taking advantage of opportunities that might support progress toward housing.

Housing specialists were also responsible for monitoring the campground for safety and security. At a minimum, staff would stop by each tent every day to say hello and make sure the person was still using the tent, similar to bed checks in the emergency shelter. As more people were housed and the caseloads shrank, more opportunities arose for in-depth conversations. Staff used a mix of structured appointments for those who could manage them and unstructured appointments for those who could not. In these cases, they would spend time on and around the campground and catch people as they became available for brief conversations and updates.

For those who remained on the roster but chose not to move onto the campground, housing specialists used progressive engagement to ensure people received the right levels of support, engagement, and services. Housing specialists informally prioritized those who needed help most urgently. In short, if someone was surviving adequately at an off-campus location then the team would focus on others. If someone's health or other status changed and they required additional care or support, then they would become a higher priority. Most of the individuals who set up camp off-campus still returned to the main GRACE campus regularly for meals, showers, mail, and other services, enabling staff to frequent those service locations to have brief, informal check-ins with people throughout the week.

Housing specialists maintained a shared office near the campground that they could use for private conversations as needed, but most progress occurred with people at their tents, again matching the process used by street outreach teams. The team met every morning to discuss plans for the day, working collaboratively to problem solve and prioritize their work to ensure individual cases were progressing toward housing, regardless of who the case was assigned to. Each specialist had an awareness of the others' caseloads.

In weekly meetings, the team again reviewed the entire roster, used their collective experience to eliminate barriers to housing, and sometimes shifted people from one team member's caseload to another's to better meet the needs of roster residents. Tasks were assigned based on the strengths of each staff member, and over time some staff members naturally assumed more responsibility for diversions, de-escalations, crisis counseling, and other forms of assistance.

The shared knowledge of caseloads typically meant that one person from the team could advocate for people on multiple caseloads at the biweekly Coordinated Entry meeting. Different programs had different documentation requirements. For example, a program using master leasing had fewer barriers to signing a lease for someone who did not yet have the required paperwork. The team worked internally to ensure the housing interventions available were

matched to the person's documentation status to facilitate even faster connection with housing.

Before moving to the new campground, many individuals in Dignity Village had shared with staff that they did not want or need permanent housing. After repeated conversations, however, staff discovered that many people saying this reported not needing housing *because they had considered Dignity Village their permanent home*. Once these individuals realized that there were, in fact, additional housing opportunities available to them, they consistently approached staff with interest in alternative arrangements. As the number of people moving into housing increased, this accelerated. Suddenly, people who had lived homeless for years knew more housed people than they did homeless people, and even more tentative commitments to housing grew stronger.

As in other communities, Gainesville and Alachua County lacked a sufficient supply of permanent supportive housing (PSH) beds to immediately accommodate the more than 100 people who would best be served with this housing intervention. To address this, GRACE staff approached the Coordinated Entry Subcommittee of the North Central Florida Alliance of the Continuum of Care (CoC) with a proposal to dynamically prioritize individuals on the Dignity Village roster. "Dynamic Prioritization" is a HUD-approved tactic to ensure the by-name list<sup>107</sup> meets the specific needs of local communities.<sup>108</sup> In practice, this would mean that—all other things being equal—a person on the Dignity Village roster would be prioritized over a non-roster resident for the next available permanent supportive housing unit.

Ultimately, the CoC approved dynamic prioritization for a two-year period beginning in October 2019. This change applied to all five counties under the CoC's jurisdiction and accomplished two things. First, it added geographic criteria (Dignity Village residency) to local prioritization standards. Second, it allowed high-acuity individuals to access existing housing resources more quickly by

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107. The by-name list is "a comprehensive list of every person in a community experiencing homelessness, updated in real time." *What is a By-Name List?*, CMTY. SOLS. (Jan. 28, 2021), <https://community.solutions/what-is-a-by-name-list/>.

108. See U.S. DEP'T OF HOUS. & URB. DEV. OFF. OF CMTY. PLAN. & DEV., 4.07 COORDINATED ENTRY: DYNAMIC PRIORITIZATION AND REALTIME DATA MGMT. 17–21, 28 (2018), <https://blog.homelessinfo.org/wp-content/uploads/2018-HUD-Dynamic-Prioritization.pdf>. The Center for Evidence-Based Solutions on Homelessness lays out three key factors in using dynamic prioritization: "(1) Effective inflow management, including the use of diversion and progressive assistance to reduce demand for the most intensive CoC assistance; (2) Dynamic priority list management, which enables communities to account for changes as new people present and new units become available; and (3) flexible use of CoC assets, so that service strategies (amount, intensity, type, and duration of assistance) can be adjusted to best serve those in need." MATT WHITE & RIAN WATT, ABT ASSOCS., INC., MOVING PAST A WAITING LIST TO NOWHERE: THE CASE FOR DYNAMIC PRIORITIZATION 4 (2018), <http://www.evidenceonhomelessness.com/wp-content/uploads/2018/03/Dynamic-Prioritization-post-1.pdf>. OrgCode Consulting has stated that dynamic prioritization, or Universal System Management, is "the best approach for addressing multiple priorities at once, making the housing process more efficient, and taking as much subjectivity out of the process as possible." 3 *Main Approaches to Coordinated Entry*, ORGCODE CONSULTING (May 2, 2017), <https://www.orgcode.com/blog/zvpqo4cnkdzlwrlvzc2sm50biuglf>.

making rapid rehousing resources (RRH) available as a bridge for people waiting for a PSH unit to become available. The two-year period matched the initial goals set by project staff. Those goals anticipated that the original roster of 222 people would be reduced by 50% within six months, by 80% within 12 months, and by 100% within 24 months.

The housing outcomes from this phase relied much more heavily on permanent housing programs through the coordinated entry system, with RRH and PSH comprising 45 of the 51 (88%) housing interventions, and other ongoing supports being provided to four other persons. In contrast to the high number of non-subsidized housing arrangements in the first phase, only two individuals were able to be housed without ongoing support in phase two.

The second phase also saw an increase in exits to temporary, institutional, and “other” destinations as staff developed relationships with campers and learned more about their needs. In this phase, we saw residents leave for long-term stays in hospitals or treatment facilities. Others were incarcerated in jail or prison and would not return to the community for at least 90 days. And eight individuals, after trying the more structured managed campground, chose to set up camp elsewhere in the community.

As of January 2022, only two people remained in GRACECamp, with another three still experiencing homelessness elsewhere in the community. Four of the five have been assigned to a social services agency who will work with them to move them into permanent housing.

#### IV. OUTCOMES

Twenty-two months after the closure of Dignity Village, only 5 of the original 222 campers remain unhoused in the community—a 98% reduction of the campground roster in less than two years. Of the 217 individuals exited from the roster, fully two-thirds—145 people—were moved into permanent housing. As of January 2022, the housing retention rate for this group ranged from 84–89%.<sup>109</sup>

The remainder of the roster exits, 72 individuals, initially exited to temporary, institutional, or other destinations. Of these 72 persons, 58 (81%) have not returned to homelessness locally as of January 2022, including five individuals who achieved permanent housing outside of the camp closure process. All told, of the 217 individuals exited from the roster, 182, approximately six out of seven, or 84%, have not returned to homelessness in the area as of January 2022.<sup>110</sup>

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109. The 145 individuals who exited to permanent housing include 109 people who moved into rental units or homes of their own, and 36 who were diverted to shared housing with family or friends. Of the 109 people who moved into rental units (or, for four individuals, homeownership), 92 (84%) have not returned to homelessness within the five-county CoC area as of January 2022. Of the 36 individuals diverted from homelessness and staying with family or friends, 32 (89%) have not returned to homelessness in the area as of January 2022. Jon DeCarmine, GRACE Exec. Dir., Dignity Village Outcomes and Current Status (Jan. 14, 2022) (unpublished report) (on file with authors).

110. This calculation includes 8 individuals who are deceased and 15 who are currently incarcerated. *Id.*

Table 2, below, describes more fully the destinations of individuals exited from the roster. Broadly, 145 of the 217 people (67%) who exited the roster moved to permanent, positive housing destinations. Of the remaining exits from the roster, 42 (19%) exited to temporary destinations and 18 (8%) exited to institutional settings. Finally, 12 people (6%) exited to “other destinations”—this includes those who died while awaiting housing or who self-exited without confirming a destination with staff.

The 54 people who exited to “temporary” or “other” destinations include 39 who exited to a place not meant for human habitation and 8 who exited with no exit interview. These 47 people are considered to have left town, at least temporarily. Staff determined this by relying on the 90-day “inactivity” standards used in the Coordinated Entry system. When HMIS records showed a person had received no homeless services, across the five-county Continuum of Care catchment area, in three months, they were removed from the roster.<sup>111</sup> While these departures effectively reduced the number of people on the roster, we have no data to suggest these individuals are no longer homeless.

Of note, only 19 of the 222 campers on the roster—less than 10% of the total roster—chose to set up camp elsewhere in the community when the Dignity Village encampment was closed. Those individuals remained on the roster, and outreach workers continued to engage with them on a regular basis, until they moved into permanent housing. As of January 2022, only two of these individuals remain homeless in the five-county area.

TABLE 2: EXIT DESTINATIONS - ALL PERSONS

<b>Permanent Destinations</b>	
Owned by Client, No subsidy	4
Rental by Client, No ongoing subsidy	30
Rental by Client, with VASH subsidy	1
Rental by Client, Other ongoing subsidy	2
Permanent Supportive Housing	46
Staying/living with family or friends, permanent tenure	36
Rapid Rehousing or equivalent subsidy	26
<b><i>Subtotal Permanent Destinations</i></b>	<b>145</b>
<b>Temporary Destinations</b>	
Emergency Shelter	1
Transitional Housing	1
Staying/living with family or friends, temporary tenure	1

111. N. CENT. FLA. ALL. FOR THE HOMELESS & HUNGRY, COORDINATED ENTRY SYSTEM OPERATING PROC 9 (2016), <http://www.ncfalliance.org/wp-content/uploads/2018/10/Alliance-Coordinated-Entry-Manual.pdf>.

Place not meant for human habitation	39
<b>Subtotal Temporary Destinations</b>	<b>42</b>
<b>Institutional Destinations</b>	
Substance Abuse Treatment/Detox	2
Hospital or other residential non-psychiatric medical facility	1
Jail or prison (for more than 90 days)	14
Long-term care facility or nursing home	1
<b>Subtotal Institutional Destinations</b>	<b>18</b>
<b>Other Destinations</b>	
Deceased	3
Other	1
No exit interview completed	8
<b>Subtotal Other Destinations</b>	<b>12</b>

#### A. Community Impact on Homelessness

The success of the GRACECamp project has not only resolved the problem of Dignity Village, but also achieved substantial reductions in the community's point-in-time count of homelessness in general, particularly for unsheltered and chronically homeless individuals. Community point-in-time (PIT) data reveals a 38% reduction in unsheltered homelessness from January 2020 to January 2021, and a 17% reduction in all homelessness during the same period. PIT data also shows a 50% reduction in the percentage of unsheltered individuals who are chronically homeless, from 48% in 2018 to 24% in 2021.

#### B. Cost Savings

Studies of the economic impact of homelessness generally focus on the costs of inappropriate uses of public services—hospitals, jails, and crisis stabilization units—by people experiencing chronic homelessness. Over the past twenty years, researchers have consistently demonstrated that services oriented toward housing save money.<sup>112</sup> People experiencing unsheltered homelessness frequently address

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112. See, e.g., Dennis Culhane et al., *Public Service Reductions Associated With Placement of Homeless Persons with Severe Mental Illness in Supportive Housing*, 13 HOUS. POL'Y DEBATE 107, 115–35 (2002); Leyla Gulcur et al., *Housing, Hospitalization, and Cost Outcomes for Homeless Individuals with Psychiatric Disabilities Participating in Continuum of Care and Housing First Programmes*, 13 J. CMTY. & APPLIED SOC. PSYCH. 171, 180–83 (2003); Mary E. Larimer et al., *Health Care and Public Service Use and Costs Before and After Provision of Housing for Chronically Homeless Persons with Severe Alcohol Problems*, 301 J. AM. MED. ASS'N 1349, 1355 (2009); Seema L. Clifasefi et al., *Exposure to Project-Based Housing First is Associated with Reduced Jail Time and Bookings*, 24 INT'L J. DRUG POL'Y 291, 294–95 (2013); Debra Srebnik et al., *A Pilot Study of the Impact of Housing First–Supported Housing for Intensive Users of Medical Hospitalization and Sobering Services*, 103 AM. J. PUB. HEALTH 316, 317–19 (2013); Jessica L. Mackelprang et al., *Housing First Is Associated with Reduced Use of Emergency Medical Services*, 18 PREHOSPITAL EMERGENCY CARE 476, 479–80 (2014).

primary health care needs in hospital emergency rooms. Arrests for life-sustaining activities like sleeping or using the bathroom generate arrests and incarceration costs as well as expenses incurred as a result of criminal justice involvement. Moving people experiencing unsheltered homelessness into permanent housing reduces policing, jail costs, and medical expenses associated with a variety of physical and mental health problems.<sup>113</sup>

The City of Gainesville, in its operation of Dignity Village in the years preceding the closure, estimated annual expenditures of \$384,000 for staffing, maintenance, and general upkeep. This estimate does not include additional expenses related to law enforcement and paramedics responding to the encampment as many as five times a day. A 2016 analysis of paramedic costs by Gainesville Fire Rescue and Alachua County Fire Rescue found GFR/ACFR units responded to the camp an average of 56 times per month. The estimated cost of these responses was \$37,100 a month, or \$445,200 each year. The vast majority of responses were for medical issues likely exacerbated by the person's unsheltered status.

Thus, between direct costs and the cost of emergency services, municipal expenditures to maintain the encampment exceeded \$800,000 annually, or \$1.6 million over two years. In contrast, the plan to close the camp and move residents into permanent housing cost less than \$700,000 over two years, including implementation costs, staffing, diversions, move-in assistance, and general operations.<sup>114</sup> The closure plan, however, relied heavily on the existing infrastructure of the low-barrier shelter campus. As such, costs for food, additional staffing, case management, basic needs, and other services are not considered in the total costs of closing the camp and setting up the new campground.

## V. CONCLUSION

The work described above illuminates the critical role housing engagement plays in successfully addressing the needs of people living in encampments. When Gainesville initially adopted an “out of sight, out of mind” approach in sanctioning the Dignity Village encampment, the lack of staffing, controls, and housing engagement led to a toxic environment that exacerbated the problem of chronic homelessness in the community. By contrast, when the City partnered with GRACE to create a temporary, regulated, housing-focused encampment on the GRACE campus, hundreds of people were successfully housed, none were arrested, and only a few dispersed to other encampments in the community. The closure of Dignity Village provides substantial evidence that sanctioned

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113. See sources cited *supra* note 112.

114. In the first year of the project, GRACE received \$118,484 for campground construction and setup, plus \$249,479 for the first ten months of campground operations, with \$299,136 budgeted for the second year of campground operations. See Service Agreement for the Provision of Homeless Services between City of Gainesville, Florida and ACCHH 3 (Nov. 26, 2019) (on file with authors). In addition, GRACE contributed \$20,000 toward diversion expenses and a wide range of in-kind support. It should be noted that this plan benefited greatly from the infrastructure already established at the one-stop assistance center where the managed camp was implemented.

encampments should be supported with adequate staffing to ensure safety and to promote movement of residents into permanent housing. Long-term, unmanaged safe camps without such supports can be detrimental to the host communities, the providers working to end homelessness, and the people those camps aim to serve.

Fundamentally, when seeking to close homeless encampments, local governments must address a key question: where can the people living in these camps go when they are closed? Setting up an interim,<sup>115</sup> regulated, safe camping area with housing-focused case management offers the promise of real reductions in unsheltered homelessness and better outcomes both for individuals living in the encampment and for the communities surrounding them. To function essentially as an outdoor low-barrier emergency shelter, such camps require the controls spelled out in the GRACECamp model above: a single point of entry and exit, behavioral expectations to ensure everyone's safety, and appropriate oversight and staffing—as well as housing-focused case management to assist residents in transitioning to permanent housing.

In conclusion, the closure of Dignity Village shows that safe camp programs can be effective tools to end homelessness when they are conceived of as outdoor low-barrier shelters and accompanied by housing-focused case management. Above all, communities must acknowledge that the connection to housing resources—not the provision of the sanctioned camp itself—is the primary service being provided. To maximize the chances of success, such programs should include the best practices<sup>116</sup> used by other components of the homeless assistance system to ensure people can access needed supports, including housing, basic needs, and mainstream benefits.

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115. Conceivably, a safe camp project could be designed to be a permanent component of a community's service delivery system, just like a typical emergency shelter facility. *See, e.g.*, Parr, *supra* note 11, at 31 (noting that Portland, Oregon's sanctioned encampment has been operating on the same site since 2001). However, there are several benefits to structuring such a project as time-limited: First, NIMBY-style and funding-based opposition to the project may be muted by its temporary nature. *See id.* at 36–39 (noting that Tacoma, Washington emphasized the temporary duration of the phased approach to sanctioned encampments it adopted, first sanctioning a site for six weeks before establishing a longer-term site). Second, operational success may be enhanced in two distinct ways: as the campground shrinks through successful housing placements, case managers can devote more time to the more difficult-to-serve individuals who remain, and those individuals' motivation to secure permanent housing may be sparked by seeing the success achieved by the former camp residents. *See generally* Icek Ajzen, *The Theory of Planned Behavior*, 50 ORGANIZATIONAL BEHAV. & HUM. DECISION PROCESSES 179 (1991) (explaining that perceptions of what others are doing affect an individual's behavioral intentions by changing beliefs about what is possible and what is expected). Similar considerations also suggest that a newly-created safe camp project may be more effective than simply assigning case workers to do outreach in an existing sanctioned encampment. Establishing new camps with housing-focused case management allows providers to “reset” the momentum toward chronic homelessness that the “out of sight, out of mind” camps may have inadvertently established. *See id.*

116. These familiar best practices include low-barrier access, trauma-informed care, housing-focused engagement, motivational interviewing, role separation between safety/security staff and service delivery staff, robust diversion efforts, and resident input. *See, e.g.*, U.S. INTERAGENCY COUNCIL ON HOMELESSNESS, KEY CONSIDERATIONS FOR IMPLEMENTING EMERGENCY SHELTER WITHIN AN EFFECTIVE CRISIS RESPONSE SYSTEM 1–4 (2017), [https://www.usich.gov/resources/uploads/asset\\_library/emergency-shelter-key-considerations.pdf](https://www.usich.gov/resources/uploads/asset_library/emergency-shelter-key-considerations.pdf).



APPENDIX A: TRANSITIONAL CAMPGROUND EXPECTATIONS

**GRACE Transitional Camp Programs** **Site # \_\_\_\_\_**

GRACE expects that you will be doing everything in your power to secure permanent housing as quickly as possible. We look forward to working *with* you on this process. Guests have the right to choose among available options for housing offered. However, repeated denials of housing will result in you being exited from the program and campground.

**General**

- Guests must use bedding provided by GRACE.
- Guests may not switch or trade platforms without staff approval.
- No smoking is allowed in any tents or within 25 feet of the tent line.
- GRACE is not responsible for the property of guests.
- The campground areas are a "quiet zone." Please use headphones when using devices.
- Guests are responsible for keeping their camping areas clean, including sheets and blankets.
- Guests are responsible for maintaining their personal hygiene.
- Prior to moving in, staff will assist with assessment of belongings for health and safety purposes.
- Guests will be assigned a long term storage area for belongings that will not fit or are not allowed in tents. You may access this storage area monthly, or when you are moving out of the campground.
- Guests will meet at least weekly with their housing specialist in order to make progress toward housing goals.
- If you come into the campground with pets we will accommodate your pets. Guests are not allowed to acquire new animals while in the campground.

**Check-in and Absences**

- Guests must check in at least once every 72-hours with their Housing Specialist.
- If you do not check in with your specialist within the 72-hour window you may lose your campsite.
- No one will be exited from their campsite without the opportunity for appeals.
- Guests that have violated the campground expectations or have not utilized their campsites in the 72-hour window have until the following Tuesday to appeal the decision before the platform is removed.

I agree to work with staff on making progress toward my housing goals.

I agree to adhere to the campground expectations laid out above as well as the appeals process.

Guest: \_\_\_\_\_  
 Printed Name Signature Date

Staff: \_\_\_\_\_  
 Printed Name Signature Date

*[Note to staff: The above expectations should be read to the guest, and guests should have the opportunity to ask questions about anything they do not understand.]*

If you have any questions about any of these expectations, please ask your Housing Specialist at your first meeting!

## APPENDIX B: DIGNITY VILLAGE CLOSURE PROCEDURE

Proposed DV Closure Procedure

1. When fence is completed, DV closure date will be set on a weekday approximately 45 days later.
2. Notice of DV closure date will be posted at the entrance to DV and on GRACE Campus. Additional written notice of DV closure date will be distributed to each person on Final Roster by GRACE staff.
3. Beginning February \_\_, DV Visitation Policy will be enforced: 24/7 security will prohibit entrance to DV by individuals who are not on the Final Roster, except in accordance with the Policy. At least 7 days prior, notice will be posted at the entrance to DV and on GRACE Campus. GRACE staff will make every effort to provide additional verbal notice to persons in DV, especially to every person who is not on the Final Roster.
4. Camp GRACE will open approximately 30 days prior to DV closure date. GRACE staff will then begin assisting individuals on Final Roster who have agreed to relocate to Camp GRACE to do so.
5. GRACE staff will continue to work with individuals on Final Roster, who have not agreed to relocate to Camp GRACE, to identify suitable housing options outside the community. GRACE staff will utilize "Go Home" funds to assist those individuals to exit to those suitable housing options.
6. Prior to the DV closure date, GRACE staff will make every effort to encourage individuals on the Final Roster to relocate either to Camp GRACE or to suitable housing options outside the community. For those who cannot be persuaded to elect one of these options, GRACE staff will make every effort to obtain contact information and intended future location from those individuals, and will make every effort to encourage those individuals to relocate prior to the DV closure date.
7. Upon and after the DV closure date, every reasonable effort will be made to enforce the closure of DV without resorting to arrest of individuals for trespassing. In particular, the following protocols will be observed:
  - a. During the week prior to DV closure date, GRACE staff will attempt to make daily contact with every remaining individual in DV and encourage relocation using progressive engagement techniques.
  - b. On the day prior to DV closure date, GRACE staff will further explain that GPD officers will be at DV tomorrow to arrest anyone who refuses to leave.
  - c. On DV closure date, GRACE staff will further explain that GPD officers are here and will arrest anyone who has not vacated DV within the next \_\_ hours.
  - d. Except in cases involving bans of individuals from DV for violence or other violations of DV rules, no arrests for trespassing will be made before the foregoing protocols have been observed.