



707 Wilshire Blvd., 10th Floor
Los Angeles, CA 90017
Ph: 213 683.3333
Fax: 213 892.0093
TTY: 213 553.8488
www.lahsa.org

MEMO

To: Henry Flatt, Office of the Chief Legislative Analyst
From: Paul Rubenstein, Deputy Chief External Relations Officer, LAHSA
Date: November 28, 2023
CC: John Wickham, Office of the Chief Legislative Analyst
Re: Los Angeles Municipal Code Section 41.18 Effectiveness Report (21-0329-S4)

Summary

This report highlights key findings by LAHSA when analyzing the effectiveness of 41.18 interventions. This analysis was performed as requested by the Los Angeles City Council under Council File [21-0329-S4](#) approved in April 2023. Effectiveness in this context refers to the initiative's ability to house individuals residing in designated encampments and limit repopulation. The sections below align generally with the data tabs in the accompanying data report. For more detailed information on each metric, you can refer to the data dictionary tab in the data report.

The main data source for this report is the Homeless Management Information System (HMIS). All clients, services, current living situations, and enrollments are pulled directly from HMIS. Resolutions, introduced by Council Districts, that designate 41.18 zones are approved by the Los Angeles City Council, which is then flagged to the CAO. The CAO then takes this information and generates GIS shape files. LAHSA uses these shape files to filter for 41.18 specific activity, the official data map can be found [here](#).

The CAO Location Tracker provided to LAHSA was used for defining signs' posted periods, the period between an area being declared a 41.18 zone and the date the ordinance came into effect. This period, generally 14 days, is the time street outreach teams are allotted to engage and deliver services to clients residing in the area with the goal of connecting them to interim housing, subject to availability. LAHSA used the shape files to overlay that data with HMIS geolocated services that occurred during signs posted periods to determine 41.18 client and outreach activity.

LAHSA's analysis found the 41.18 interventions between December 2021 and November 2023 were generally ineffective in permanently housing individuals. Most individuals impacted by 41.18 operations had already been actively searching for housing with an outreach worker. Clients were connected to housing during the sign posted period at a rate almost identical to the overall system average. Those that were connected to interim housing were also unlikely to experience successful outcomes. Most encampments saw client repopulations within a year. Lastly, general data quality issues that began during a rushed roll-out process made accurate reporting difficult. In general, the framework of 41.18 falls short of more effective encampment resolution efforts, such as Inside Safe or other Encampment-to-Home initiatives.



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Data Quality

The overall data quality surrounding reporting on 41.18 is low when compared to other encampment resolution initiatives, such as Inside Safe, as 41.18 does not have any funded components for services or interim housing. There was also no formal request in the ordinance language or accompanying street engagement strategy that requested City Departments or LAHSA to develop universal tracking standards. To accurately track activity from initiatives not set up with an HMIS program ID, proper data infrastructure must be established before deployment. In the case of 41.18, encampment resolutions began late in 2021 before tracking design and testing were possible. This landscape abbreviated infrastructure development and led to a prolonged delay in official reporting from LAHSA's Data Management team.

At the time of this report, 240 encampments have signs posted dates. Of that set, only 174 encampments had recorded current living situations (CLS) or service activity during the signs posted period. This limits the number of encampments we were able to report on properly. This discrepancy may be caused by either bad or non-existent geolocation tracking by groups on the ground or the outreach efforts that occurred before or after the signs posted dates thus not making it into the reported data.

Recommendation: LAHSA recommends that it be heavily involved in the development of homeless policy design, especially as it relates to data capturing and quality, early enough to establish reporting mechanisms before the official program initiates. Depending on the scope of the project, this may require cooperation a minimum of three months in advance.

One result of the rushed manner in which the ordinance was implemented was the lack of proper client/encampment designation within LAHSA's system. The use of CLS and geolocated services is generally used to tie client interactions to encampments. However, in the case of 41.18, the two-week period outreach workers are given to find housing, if available, for clients combined with concurrent signs posted periods, created a more difficult environment for proper recording of geolocations. The nature of field interactions in high-profile encampment areas is such that verifying whether a client interaction is the direct result of a 41.18 intervention, or a more general outreach interaction, is impossible. For the purposes of transparent reporting, all interactions recorded in 41.18 zones during the signs posted period are assumed to be 41.18 interactions. There are certainly clients that could not be properly reported on due to these complications.

Recommendation: Inside Safe and Pathway Home use client rosters that are later uploaded to HMIS to properly designate clients to their given encampment. This is done well in advance of any operations taking place. Any individuals found in the 41.18 zone that are not on the client roster, would then be removed from the original cohort for higher quality reporting. LAHSA recommends this practice for all encampment resolution initiatives.

The final data quality piece we will address is with respect to proper data tracking between the City and LAHSA. Council Districts designate 41.18 zones and request signage from the CAO, which creates the signage. The data from the CAO includes the shape files for each zone and the location tracker with the



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data of the posted signage date. These files were shared separately without proper indicators for linking the information together.

Recommendation: When information needs to be stored in separate data files, best data practice requires unique identifiers be included in all files for easy joining. In this case, the file with shape data must have an identifier for each encampment that matches up with the file containing signs' posted dates. An example of a unique identifier could be a number or random string (ex. 1W28TJ) so long as it is unique to each encampment and remains unchanged once it is generated. Manually entered data records like names or addresses are not generally reliable in datasets with 100+ records. Such a unique identifier should be used among all City Departments that are involved in 41.18 operations, including the CAO and LASAN.

Recommendation: A barrier that impacts data quality is proper notification to LAHSA of sign-posting dates. Establishing protocols for sign posting notifications among key partners, including LAHSA, will improve documentation of CLS and geolocations, thereby improving our ability to report on outreach activities. Outreach teams are tasked, within the Street Engagement Strategy, with providing services and available resources to those experiencing homelessness residing in 41.18 zones yet little notice is given to LAHSA teams to adequately plan for outreach activities to be triggered.

Client Populations

41.18 clients are defined as clients with either a current living situation (CLS) or a geotagged service received inside the given 41.18 encampments during the signs posted period. The client populations tab in the attached 41.18 data report designates each client to one encampment based on their first outreach interaction during a sign's posted period. This choice to designate each client to one encampment did not affect most clients; only about 1 in 5 (18.5%) 41.18 clients recorded a 41.18 interaction in multiple encampments. With this framing, the median number of clients per encampment was 5.5. That number increases to 6 when allowing clients to be designated to multiple encampments. The average number of clients per encampment is much higher (~10.67), which tells us most encampments had single-digit clients while a few large outlier encampments increased the average.

A key question we looked to answer with this analysis was client participation. We found that 93.5% of 41.18 clients tagged in an encampment were enrolled in Street Outreach and engaged during the signs posted period. This means that a significant majority of individuals were actively working with their outreach workers to find housing before the 41.18 ordinance came into effect. It is worth noting that without proper tracking, we cannot verify if there were clients residing in the area who did not directly interact with outreach workers. This would be resolved by developing protocols that require client rosters.

41.18 enforcement was likely not the first interaction with the homeless services system for most individuals. We found that 66.0% of all 41.18 clients had been enrolled and engaged at least a month before their respective encampment's signs were posted. Only 17.6% of clients enrolled in a street outreach program for the first time during their 41.18 signs posted period. As many people are already



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engaging with services, encampment clearings can disrupt their service pathway. Clients may move away from the location and providers may lose contact after clients are displaced. Clients may also become distrustful of providers and refuse services after being forced to move from their current location. Encampment clearings can lead to a loss of ID and documentation that are crucial for ongoing services and eventual housing.

Housing Placements

When analyzing the effectiveness of 41.18, our scope is limited to street outreach exits and interim housing placements as the program did not have permanent housing resources allocated for clients. It is important to note that the law, as written, made no allocations or requirements for additional housing resources to be available prior to or during any enforcement operation. However, Council Districts do often make requests to reserve interim housing beds in their districts, upon availability, for those within a 41.18 encampment resolution initiative, like A Bridge Home or Tiny Home Village. Only two clients exited their street outreach program to permanent housing. This is not unusual, as street outreach exits to permanent housing are historically rare regardless of program. This meant that those who were effectively housed before being displaced were almost exclusively moved to interim housing.

LAHSA found that 16.9% of 41.18 clients were placed into interim housing before their encampment clearing. This finding is directly in line with expectations. According to LAHSA's system KPIs, 17% of street outreach clients were connected to interim housing each of the last two fiscal years. The median length of stay for 41.18 clients who were placed into interim housing was 53 days. This data shows that without dedicated housing resources, it is difficult to move people from encampments to interim and permanent housing.

Of those placed into interim housing, 54.6% either exited to a place not meant for habitation or exited to an unknown destination (i.e., an exit interview was not conducted, or the exit destination could not be collected). This means that of all 41.18 clients whose outcomes we analyzed, 92.2% either did not receive housing before being displaced, exited their IH placement back to the streets, or are unaccounted for.

Repopulation

For the purposes of this report, repopulation is defined as recorded services or CLS in a given encampment by a 41.18 client at least 14 days after the effective sign date. Most repopulations, however, occurred over a larger timeline than 14 days. The median number of days to repopulation was 157. The average number of days to repopulation was 342.

Before 41.18 operations, LAHSA outreached to people experiencing homelessness living in the encampment to provide them housing options, if available. After 41.18 operations, LAHSA outreach teams will periodically visit the area, as outlined in the Street Engagement Strategy, especially if it has been populated for a long time. LAHSA teams continue to maintain contact, where possible, with individuals who might not have accepted housing options before the operation and continue working with them to



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get placed in shelters. It is of note that some of these repopulations are an indication that signs' posted dates were not enforced. Better tracking of enforcement would allow us to analyze the likelihood of repopulation in encampments that we could confirm were cleared out.

With the available data, we found that 81% of encampments saw a repopulation from a client previously designated there, and 77% of encampments saw a repopulation from another encampment. These numbers indicate that 41.18 encampments were likely to see repopulation within a calendar year. This, in conjunction with poor data quality and the low likelihood of 41.18 clients finding sustainable housing, renders the current way that 41.18 initiatives are conducted relatively ineffective.