



POLICING AND HOMELESSNESS

**A White Paper from the
Academy for Justice**



Acknowledgments

This white paper is a production of the **Academy for Justice** at the Sandra Day O'Connor College of Law at Arizona State University. The catalyst for this white paper was a roundtable held on September 15, 2022, at the Sandra Day O'Connor College of Law, in which a panel of experts and a number of professional participants gathered to talk about policing and homelessness and ways we can think about the topic moving forward. The white paper is intended to provide proposed solutions and strategies in the overlapping fields of policing and homelessness.

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Chief Andre Anderson, also the prior Assistant to the National President and prior Region VI NOBLE President; and the AZ Doeg Nelson NOBLE Chapter President and Tempe Police Commander Rashidi Johnson.

We are especially thankful to the panelists who shared their knowledge and expertise to explore best practices and alternatives in the overlapping fields of policing and homelessness: Joanna Lucio, Sr. Associate Dean of Academic and Student Affairs, Watts College at Arizona State University, Ben McJunkin, Associate Professor of Law and Deputy Director of the **Academy for Justice**, Affiliated Faculty Member with the School of Criminology and Criminal Justice, Ana Rausch, Vice President of Program Operations, Coalition for the Homeless, Terry Skolnick, Assistant Professor and Co-director of the uOttawa Public Law Centre, University of Ottawa, Cody W. Telep, Associate Professor and Associate Director, School of Criminology and Criminal Justice at Arizona State University, and Michael Scott, Clinical Professor and Director of the Center for Problem-Oriented Policing, School of Criminology & Criminal Justice (CCJ) at Arizona State University.

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About the Academy for Justice

The **Academy for Justice** at the Sandra Day O'Connor College of Law at Arizona State University is dedicated to bridging the gap between academia and on-the-ground criminal justice reform by making scholarly research and ideas accessible to policymakers, stakeholders, journalists, and the public. Our primary objectives include identifying the major challenges confronting our criminal justice system; developing and promoting fact-based, non-partisan scholarship that identifies potential reforms; and facilitating the sharing of information between academics and those responsible for making and implementing criminal justice policy.

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I. EXECUTIVE SUMMARY

The escalating homelessness crisis places law enforcement in the untenable position of addressing community complaints for non-criminal or low-level offenses. Housed citizens, including business and property owners, often call on police as first responders to remove visible homelessness. With few or no other alternatives, law enforcement officers are obligated to respond. **Enforcing criminal prohibitions against “living in public” does little to remedy the underlying issues leading to homelessness and is ultimately ineffective at addressing business and property owner concerns.** When communities make a concerted effort to meaningfully dedicate resources to ending homelessness, they’re one step ahead in alleviating this irreconcilable tension for law enforcement. Further, there are several strategies that can be implemented to decrease this tension and make tangible progress including (A) deprioritizing criminal enforcement of homelessness-related offenses, (B) decriminalizing homelessness on a legislative level, and (C) developing collaborative responses to the root causes of homelessness.

II. PROBLEM STATEMENT

The federal government estimates that 580,466 people were unhoused during a single point-in-time in 2020;¹ the fourth consecutive year of an increase in people who are unhoused after a decade of steady declines.² Additionally, more and more individuals are experiencing “chronic” patterns of homelessness—continuous homelessness for at least one year or at least four periods of homelessness in the preceding three years.³ This increase can be attributed to the rise in housing costs along with a national shortage of affordable housing.⁴

As the number of individuals living without housing has increased, so too has the percentage of those individuals who live unsheltered.⁵ Unsheltered individuals are people living in encampments, vehicles, or other places not

¹ OFF. OF CMTY. PLAN. & DEV., U.S. DEP’T OF HOUS. & URB. DEV., THE 2020 ANNUAL HOMELESS ASSESSMENT REPORT (AHAR) TO CONGRESS 6 (2021).

² *Id.* at 7.

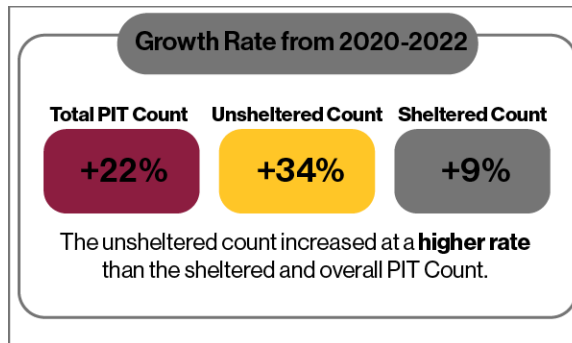
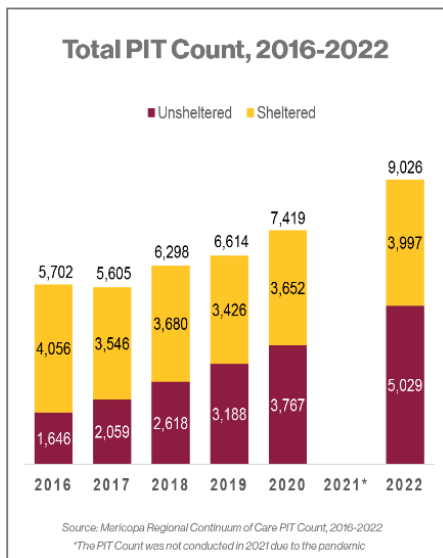
³ *Id.* at 1–2.

⁴ NAT’L L. CTR. ON HOMELESSNESS & POVERTY, HOUSING NOT HANDCUFFS 2019, at 11 (2019).

⁵ OFF. OF CMTY. PLAN. & DEV., *supra* note 1, at 1.

designed for human habitation.⁶ In 2020, 39% of federally counted unhoused people were classified as unsheltered.⁷

Consistent with national trends, Maricopa County has seen significant increases in the number of people experiencing homelessness—including both sheltered and unsheltered individuals over the past six years.⁸ According to the Point-in-Time (PIT) homeless count—an annual street and shelter count to determine the number of people experiencing homelessness—the number of chronically homeless individuals increased by 73%.⁹ In the last two years, the unsheltered count increased by 34%.¹⁰ These local numbers tell a consistent story about what the rest of the country is experiencing.



⁶ *Id.* at 3.

⁷ *Id.* at 6.

⁸ MARICOPA ASS'N. OF GOVTS., 2022 POINT-IN-TIME (PIT) COUNT REPORT 1 (2022).

⁹ *Id.* at 1, 3.

¹⁰ *Id.* at 1.

Whether sheltered or unsheltered, unhoused individuals go about the necessities of human existence in public. Living in public—sleeping, eating, resting, showering, working, using the bathroom—often makes housed individuals uncomfortable and creates concerns for business and property owners. In response to their constituents, local lawmakers draft ordinances and laws to constrict the daily existence of people who are unhoused.¹¹

City ordinances that prohibit loitering in parks, resting at bus stops, obstructing sidewalks, pitching tents, asking for money, asking for work, and sleeping in public explicitly criminalize living in public.¹² **Since 2006, city-wide bans on camping in public increased by 92%;¹³ bans on begging increased by 103%;¹⁴ bans on sitting or lying down increased by 78%;¹⁵ and bans on standing around increased by 103%.¹⁶** “[T]he act of surviving in public is so tightly regulated that people experiencing homelessness cannot avoid somehow tripping a wire and incurring significant, potentially life-altering consequences.”¹⁷

Police and prosecutors are tasked with enforcing these laws. Much of their response is determined by policy or operations orders which dictate citations, arrests, and guilty pleas with little room for problem-solving or diversionary options. Criminal convictions, and in some cases, simply arrests, can render people ineligible for jobs, housing, food stamps, shelters, and other government services and benefits.¹⁸

Criminal fees and fines are also frequently beyond the means of people who are unhoused and require them to prioritize court compliance over basic needs.¹⁹ Nonpayment of fines and fees can result in failure-to-pay warrants. The next contact with police—a likely event—results in an arrest on that warrant. That trip to jail alone can cost someone their employment, possessions, and freedom. Additionally, a pause or lapse in access to

¹¹ NAT'L L. CTR. ON HOMELESSNESS & POVERTY, *supra* note 4, at 9.

¹² *Id.* at 12–14.

¹³ *Id.* at 12.

¹⁴ *Id.* at 13.

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ Sara Rankin, *Criminalizing Visual Poverty: The Effects of Making Homelessness a Crime*, JURIST (Nov. 21, 2016, 2:24 PM), <https://www.jurist.org/commentary/2016/11/criminalization-of-visual-poverty>.

¹⁸ NAT'L L. CTR. ON HOMELESSNESS & POVERTY, *supra* note 4, at 15–16.

¹⁹ *Id.* at 52.

government benefits, and a lack of continued access to resources such as case management teams, peer supports, and shelters often results. **National data shows that incarceration (including incarceration for homelessness-related offenses) significantly increases the likelihood of homelessness resulting in further perpetuation of a nearly unbreakable cycle.**²⁰

Repeat “offenders” are often sentenced to several days in jail. Aside from jail time, sentences often include area restrictions, further disrupting where people live and disconnecting them from the community they consider home. **Sentences that include restrictions against using public transportation disproportionately affect both those living in poverty and homeless individuals, and may eliminate their only manner of transportation for accessing basic needs and services including court, doctors’ appointments, and gainful employment.** Criminalization further traps unhoused people in cycles of poverty and incarceration.²¹

In recent years, several appellate courts have responded to civil rights claims by unhoused individuals asserting constitutional protection claims. In *Martin v. City of Boise*, the Ninth Circuit held that the Eighth Amendment prohibits arresting or citing an individual for public camping when alternative shelter is not reasonably available.²² Other courts have held that criminal prohibitions on public begging and sharing food with people who are unhoused may violate the First Amendment’s right to free speech.²³ Some courts have also found a Fourth Amendment right to protection against confiscation and destruction of personal possessions, even when on public property, and have struck down ordinances that prohibit residing in vehicles as being unconstitutionally vague.²⁴

²⁰ Kaya Lurie & Breanne Schuster, *Discrimination at the Margins: The Intersectionality of Homelessness & Other Marginalized Groups*, SEATTLE UNIV. SCH. OF L. DIGIT. COMMONS 1 (2015).

²¹ NAT’L L. CTR. ON HOMELESSNESS & POVERTY, *supra* note 4, at 15.

²² *Martin v. City of Boise*, 902 F.3d 1031, 1049 (9th Cir. 2018).

²³ *Fort Lauderdale Food Not Bombs v. City of Fort Lauderdale*, 901 F.3d 1235, 1238 (11th Cir. 2018).

²⁴ *Lavan v. City of Los Angeles*, 693 F.3d 1022, 1032 (9th Cir. 2012); *Desertrain v. City of Los Angeles*, 754 F.3d 1147, 1157 (9th Cir. 2014).

Though many jurisdictions have developed alternative, non-criminal responses to homelessness, the current reality is that police are often the first and **only** responders for public concern. **The complex intersections of basic needs, property owner interests, department policies, criminal law, and constitutional protections often place law enforcement in an irreconcilable position.** To reconcile the complexity and reach tenable solutions, decision-makers must ask:

1. How can police and prosecutors **deprioritize** policing crimes related to living without housing?
2. When law enforcement is called to respond, what are the **best practices** for engagement?
3. Can current laws be restructured to **decriminalize homelessness**?
4. Who should respond to non-criminal complaints centered on public living issues?
5. How can stakeholders be engaged in **cross-agency collaboration** to address both community concerns and the needs of people who are unhoused?

III. **PROPOSED SOLUTIONS AND STRATEGIES**

A. **Deprioritize Criminal Enforcement of Homelessness**

Deprioritizing enforcement of low-level and non-violent criminal conduct is a critical step in the movement away from policing homelessness. Deprioritization can take both informal (policy and practice changes) and formal (building a service provider and alternative dispatching infrastructure) approaches.

Informally, without establishing an expansive and expensive service provider infrastructure, law enforcement agencies can make discretionary policy decisions to not exercise their authority to cite and arrest, or book, low-level offenses—especially those with no individual victim. As an example, in the case of the broad range of trespasses (ranging from Class 3 misdemeanors to Class 6 felonies in Arizona), operations orders and on-scene practices could dictate

an arrest only if an individual refuses to leave the property, if there is a complainant, or if the individual has active warrants.²⁵

As an example, the Phoenix Police Department's operations orders currently have a "reduced prosecution" protocol for certain offenses, including vacant residential trespass (a Class 6 felony)—a criminal offense often related to homelessness. This "reduced prosecution" protocol gives officers the authority to cite a misdemeanor trespass, and consequently avoid a mandatory felony booking, for individuals without warrants and without certain prior convictions.²⁶ On the chance that a felony booking results from such contact, the Maricopa County Attorney's Office often exercises discretion to not file any charges and send the case to municipal prosecutors who then exercise the same discretionary decision to not file charges. **Unifying discretionary arrest policy for law enforcement with discretionary prosecutorial charging policy could significantly reduce both charging and bookings and ultimately reduce unnecessary displacement and criminal justice involvement.**

Creating solution-centered approaches to deprioritize homelessness does not stop at police departments and individual officer responses. Prosecutors must be brought into the conversation to understand the disproportionately punitive consequences of charging and plea decisions for homelessness-related conduct. Often, prosecutors request bond or sentence conditions that prohibit an individual from returning to the area where they trespassed or from public transportation. Area restrictions on the place where an unsheltered individual was residing are akin to prohibiting a person from returning to their home, a consequence that rarely happens outside domestic violence crimes. Restrictions against public transportation can effectively eliminate an individual's ability to navigate daily living beyond a few blocks—getting to court, food, shelter, hygiene, medical, dental, and mental health services is nearly impossible in large cities without access to public transportation.

²⁵ Though property owners may object, if individuals leave, the issue of entering and remaining on the property is remedied. In practice, full prosecution through trial fails as a result of property owners failing to participate in trial.

²⁶ PHOENIX POLICE DEP'T., OPERATIONS ORDER 4.10(10), *available at* <https://public.powerdms.com/PhoenixPD/tree/documents/1599410>. While good in theory, there is no analogous misdemeanor for vacant residential trespass unlike many of the other enumerated offenses designated as eligible for reduced prosecution; a legislative change classifying vacant residential trespass as a Class 1 misdemeanor would align the practice of police and prosecutors with the class of offense.

Prosecutors arguably hold the most power in the criminal courtroom. An increase, or in some places, development of, solutions-based responses and diversionary programming can arm prosecutors with discretion to deprioritize homelessness. The existing literature points towards non-carceral alternatives, such as housing-first solutions, as being both more effective and less expensive.²⁷ **Several cities that compared the costs of implementing a housing-first model to the costs of responding to homelessness on the streets and in shelters saw cost savings ranging from \$21,014 to \$54,086/year per person.**²⁸ Consistent with the social services agencies and needs discussed below, diversionary programs that connect unsheltered individuals to identification, safe shelter, substance use and mental health services, food, and hygiene services can significantly reduce the cycle of continued contact with the criminal justice system. But, none of that is possible without a concerted effort across stakeholders to deprioritize homelessness.

B. Decriminalize Homelessness

Decriminalizing homelessness is a tandem act of both changing laws and changing public perception. Can laws really be changed without a shift in public perception first? “[P]eople would likely never criminalize homelessness were they not already secure enough in their social situation to know that it will likely never afflict them.”²⁹ **A crucial piece in legislative change is changing the narrative to humanize people living without housing.**

To begin collaborative change, all actors must shift their perspectives and preconceived notions. A change in the “us vs. them” mentality is a first step. The prevailing narrative that law enforcement is not keeping “everyone else” safe from “those that are visibly unsheltered” needs to be dismantled. The heart of the issue is to understand the lives of people who are unhoused. Community-wide collaboration focused on education, volunteer work, and community-

²⁷ Sam Tsemberis & Ronda Eisenberg, *Pathways to Housing: Supported Housing for Street-Dwelling Homeless Individuals With Psychiatric Disabilities*, 51 *PSYCHIATRIC SERVS.* 487, 487 (2000); SAMANTHA BATKO ET AL., *URB. INST., ALTERNATIVES TO ARRESTS AND POLICE RESPONSES TO HOMELESSNESS*, at v–vi (2020), <https://www.urban.org/sites/default/files/publication/103158/alternatives-to-arrests-and-police-responses-to-homelessness.pdf>.

²⁸ GREGORY A. SHINN, *CENT. FLA. COMM’N ON HOMELESSNESS, THE COST OF LONG-TERM HOMELESSNESS IN CENTRAL FLORIDA* 8, 13 (2014), <https://www.cfch.org/wp-content/uploads/2018/04/Eco-Impact-Report-LOW-RES-2.pdf>.

²⁹ Ben A. McJunkin, *Ensuring Dignity as Public Safety*, 59 *AM. CRIM. L. REV.* 1643, 1656 (2022).

based funding is a starting point to destigmatize and humanize people who are unhoused.

The constitutional and legally ethical ramifications of criminalizing homelessness are consequential. Because **voluntariness is a core tenet of criminal law** and unsheltered individuals are often living in public by circumstance rather than choice (absence of viable alternatives to living outside removes choice), **criminalization of homelessness is arguably at odds with the fundamental legal principles that underpin legitimate enforcement of laws aimed at public living**. Criminalization of presence is a problematic legal position.

Additionally, recent appellate cases have consistently conscripted law enforcement response to homelessness. Several appellate courts have preserved the right to live in public spaces where there are no meaningful alternatives, the right to have property preserved, and to reside in vehicles.³⁰ The judicial branch is increasingly exercising its interpretation role in favor of reducing the criminalization of homelessness and public presence.

From a public policy perspective, criminalizing homelessness is an expensive and ineffective means to permanent housing solutions.³¹

There are high costs associated with arresting, jailing, and incarcerating people for acts related to being unhoused. **The cost of keeping someone in jail for a week can be the equivalent of rent for a studio apartment for a month or more.**³² Multiple studies in large metropolitan areas consistently show that there are significant costs associated with law enforcement responding to homelessness issues and a large portion of those costs do not correlate to citations or arrests.³³ In one 90-day period in Denver, researchers estimated it cost the city nearly \$4,000 in criminal justice system-related costs, including \$2,700 of that \$4,000 for 18 police contacts that did not result in a citation,

³⁰See *Martin v. City of Boise*, 902 F.3d 1031 (9th Cir. 2018); *Fort Lauderdale Food Not Bombs v. City of Fort Lauderdale*, 901 F.3d 1235, 1238 (11th Cir. 2018); *Lavan v. City of Los Angeles*, 693 F.3d 1022, 1032 (9th Cir. 2012).

³¹ NAT'L L. CTR. ON HOMELESSNESS & POVERTY, *supra* note 4, at 71.

³² *Id.*

³³ Emily Peiffer, *Five Charts That Explain the Homelessness-Jail Cycle—and How to Break It*, URB. INST. (Sept. 16, 2020), <https://www.urban.org/features/five-charts-explain-homelessness-jail-cycle-and-how-break-it>.

arrest, or booking.³⁴ Los Angeles spent \$79.6 million on booking and jail costs for people experiencing homelessness in the fiscal year 2014-2015.³⁵

Costs to the government don't fully account for the costs incurred as a result of encampment sweeps or street cleanups. The intangible costs of displacement—loss of community, and loss of property (medication, clothing, documents)—are difficult to capture, but are far more important to the individuals subject to the loss.³⁶

Law enforcement holds substantial lobbying power through police and corrections officer unions. The significance of this influence over criminal justice policy is monumental. Though prosecutorial lobbying influences vary nationally, where it does hold influence, prosecutors can sign-on in the same way as police and corrections. Local consensus across the executive branch supporting the decriminalization of homelessness could make significant headway with legislators. Codifying appellate decisions, like *Martin's* no citations unless reasonable alternatives for shelter exist and *Lavan's* prohibiting penalizing residing in a vehicle, could begin the decriminalization process. Implementing further carve-outs or exceptions to criminal statutes for conduct driven by homelessness could also continue the movement toward decriminalization.

C. Develop Collaborative Responses

Law enforcement agencies are unlike many public services: they are available 24/7, can quickly arrive on a scene, and have enough personnel to be in many places at once. They are also whom the public thinks to turn to when a concern arises. **It is inevitable that police will be called on as a first response to public concern so long as the default for that concern is to dial 911.** With a robust community network system built over time, police will be called upon

³⁴ Sarah Gillespie et al., *The First Step Toward Breaking the Homelessness-Jail Cycle*, URB. INST. (May 19, 2016), <https://www.urban.org/urban-wire/first-step-toward-breaking-homelessness-jail-cycle>.

³⁵ FEI WU & MAX STEVENS, THE SERVICES HOMELESS SINGLE ADULTS USE AND THEIR ASSOCIATED COSTS: AN EXAMINATION OF UTILIZATION PATTERNS AND EXPENDITURES IN LOS ANGELES COUNTY OVER ONE FISCAL YEAR 21 (2016), <https://homeless.lacounty.gov/wp-content/uploads/2019/02/homeless-costs-final.pdf>.

³⁶ NAT'L L. CTR. ON HOMELESSNESS & POVERTY, supra note 4, at 73.; U.S. INTERAGENCY COUNCIL ON HOMELESSNESS, SEARCHING OUT SOLUTIONS: CONSTRUCTIVE ALTERNATIVES TO THE CRIMINALIZATION OF HOMELESSNESS 7 (2012), <https://www.usich.gov/tools-for-action/searching-out-solutions/>.

less and less for these types of concerns and instead, more appropriate individuals will be dispatched on the front end.

Co-dispatching and alternative dispatching—similar to the Crisis Intervention Teams employed in the mental health arena—could be formed for homelessness response. Co-dispatching pairs police and community service providers as dual responders. Alternative dispatching allows for a non-police provider to be dispatched instead of police. The sequential intercept model establishes a framework to apply a co-dispatching and alternative dispatching response to homelessness by allowing a different actor to respond in addressing the concern depending on the individual needs. Alternative and co-dispatching in a sequential intercept model for homeless individuals could produce similar pre-police diversionary benefits of relieving demand on law enforcement and increasing service connection.³⁷ Alternative dispatching, would result in community services responding to non-criminal or pre-determined low-level criminal conduct rather than law enforcement; moving through this model, dispatched police officers can divert individuals to service providers rather than citing either through co-dispatching or by referrals to services; and prosecutors and the courts can develop additional solutions driven responses to homelessness.

Key elements for a successful referral infrastructure include services to connect unhoused/unsheltered individuals to: safe shelter, long-term housing solutions, identification services, substance use and mental health services, medical and dental care, transportation, food, living necessities, and hygiene services.

1. Universal Human Needs

The existence of and ability to make referrals for accessible safe shelter, food, water, clothing, hygiene, secure storage, mail/email services, and medical and dental care, is necessary for an effective collaborative response. **Providing law enforcement, both at the point of dispatch and when officers respond in the field, with meaningful diversions to services to meet the needs of the homeless populations in their communities is necessary to both decriminalize homelessness, as discussed above, and to alleviate the**

³⁷ Substance Abuse and Mental Health Serv. Admin., *The Sequential Intercept Model (SIM)*, U.S. DEP'T OF HEALTH & HUM. SERVS. (Sept. 27, 2022), <https://www.samhsa.gov/criminal-juvenile-justice/sim-overview>.

burden on law enforcement as the only responders. Services exist, but formal processes to divert those experiencing homelessness to the services are lacking.

Maricopa County's Human Services Campus (HSC)—a collaboration of non-profit organizations, government entities, community organizations, and faith-based agencies—came together in 2005 and has taken a step towards achieving the goal of providing and connecting the unhoused with universal human needs. In addition to connecting homeless individuals and families to housing, the HSC coordinates multiple service providers across the spectrum of needs. After intake, clients can both receive services on the campus and receive referrals for off-site providers. The campus provides on-site medical and dental services, safe storage for property, employment support, post office services, meals, assistance with state benefits, chaplaincy, and shower access.³⁸ Connecting these critical services through a formalized dispatching or referral process (including transportation to access these services) is necessary for collaborative response. To be sure of its success, the HSC is often considered and touted as a national model.

2. Treatment Service Connections

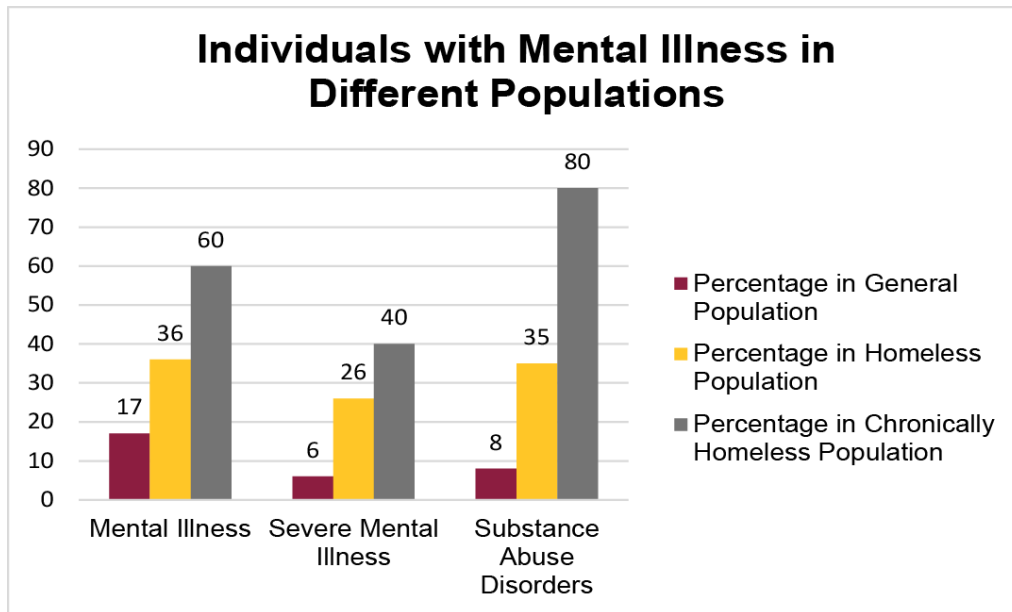
The intersectionality of homelessness, mental health, and substance use disorders cannot be understated. While only 17% of adults experience mental illness in a year, 30-43% of the national homeless population suffer from mental illness, and 60% of the chronically homeless have experienced a lifetime of mental illness.³⁹ Severe or serious mental illness is also disproportionately present in the homeless population: less than 6% of the general population, 20-33% of homeless individuals, and up to 40% of the chronically homeless.⁴⁰ Substance use disorder shows similar disproportionality, only 8.2% of the general population are classified as having substance use or dependence, but 35% of the homeless (up to 50% when substance use co-occurs with mental illness) and 80% of the chronically homeless populations struggle with substance use or dependence.⁴¹

³⁸ *HSC Services*, HUM. SERVS. CAMPUS, <https://hsc-az.org/services/>, (last visited Jan. 24, 2023).

³⁹ *Id.*

⁴⁰ *Id.* at 26.

⁴¹ *Id.*



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Any response to the homeless population requires acknowledgment of these inextricably linked factors. For officers responding to calls, awareness of this connection will be critical for triaging which service provider to partner with for alternative or co-dispatching as discussed above. Amplifying the training that dispatchers and officers currently receive for identifying mental health and substance use issues in the field, and their connection to homelessness could improve the referral process.

This front-end shift has the opportunity to provide cost savings and produce beneficial results across the board. **If law enforcement is no longer responding or is able to hand off lengthy interactions to social service providers, their time is freed to focus on high-level criminal offenses, and the trickle-up reduces demands on courts and prosecutors as well.** When homeless individuals are diverted away from the criminal justice system, the costs of citations, bookings, and jail stays decline. If homeless individuals are connected to services rather than cycling through a criminal justice system that provides little or no opportunity or support to remedy the cause of the criminal conduct, there is a real possibility of change and ending the cycle of homelessness.

⁴² Lurie & Schuster, *supra* note 20, at 25.

IV. CONCLUSION

If police refrain from arresting individuals for homelessness-related activity and prosecutors use discretion to not pursue charges for the same, change is possible. Collaborative community response can take place with police departments and community services working in tandem to connect people in need to the services they need. Building a response network where **law enforcement connects people with community services and organizations that aid in providing essential services** can shift the reliance from the police to organizations whose mission is to serve the unhoused. To adequately serve those most vulnerable, a multi-agency, partnered response with a treatment-centered focus to prioritize the humanity of the unhoused population must be implemented. Housing-centered and solution-focused partnerships between law enforcement and community-based services should be the approach taken by cities to provide for long-term stability that humanizes unhoused people living in their communities. **But none of this will truly be possible and results-focused until there is (A) deprioritization of the criminal enforcement of homelessness related offense, (B) decriminalization of homelessness through informal police and prosecutor policies and on a legislative level, and (C) development of collaborative responses to properly address homelessness.**