

System Response Review Toolkit

Safeguards, Questions, and Alternatives for Proposed Homelessness Response Projects

A practical guide for reviewing proposed shelter, enforcement, and system-response strategies

This toolkit is designed to help participants examine a proposed system response, identify where safeguards are strong or still needed, and translate concerns into constructive pivot points, conditions, and alternatives.

Primary audience: This toolkit is designed for homeless response system leaders, Continuum of Care partners, providers, funders, public-sector decision-makers, advocates, and people with lived expertise who are reviewing a proposed or expanding community response.

Use this tool when: a community is considering a new or expanded shelter model, enforcement-linked response, involuntary pathway, vendor/data platform, or major funding shift that could reshape how people move through the homelessness response system.

How to use this toolkit

Use this toolkit in three passes:

1. First, scan for system pressures that may require more attention.
2. Next, score the strength of safeguards and identify where gaps remain.
3. Finally, use the questions and pivot points to shape constructive next steps, conditions, alternatives, or public comments.

This is not a legal review or a pass/fail scorecard. It is a decision-support tool to help communities:

- identify system pressures,
- ask stronger questions, and
- clarify safeguards,
- consider practical alternatives

The goal is to get a holistic image of what is happening and where there might be areas of concern before major commitments become difficult to change.

Part A — Notice the System Pressures

Scan for warning signs, pressures, and emerging shifts.

Use this section as a quick scan. Check any items that are present, proposed, or beginning to emerge in your community. A checkmark does not mean a proposal should automatically stop; it means the issue may need clearer information, stronger safeguards, or a more intentional pivot point before the community moves forward.

Check any items that are present or trending. The more checks, the more clarification, safeguards, or pivot points may be needed.

Laws & enforcement

- ☐ Public-space bans/citations increase (camping, sitting, sleeping, etc.).
- ☐ Service connection relies primarily on enforcement contact.
- ☐ Enforcement increases for the stated purpose of “cleanliness” or “safety.”
- ☐ State preemption limits local discretion or mandates enforcement approaches.
- ☐ Civil penalties escalate toward criminal penalties.

Funding & incentives

- ☐ Flexible funding increasingly favors congregate responses over housing/prevention.
- ☐ Funding is tied to compliance/enforcement metrics rather than housing outcomes.
- ☐ Capital funding is secured, but ongoing operations, services, clinical supports, housing navigation, and exit resources are vague, unfunded, or dependent on short-term funding.

Facilities & operations

- ☐ A large congregate site (100+ beds) is pitched as the “solution.”
- ☐ Housing exit pathways/throughput assumptions are unclear.
- ☐ Staffing assumptions are not yet sufficiently detailed or feasible, including job roles, ratios, qualifications, and 24/7 coverage.
- ☐ Rules reduce access (sobriety/behavior compliance, removals) without a clear appeal process.
- ☐ There is no clear plan for people who are denied entry, removed, or unable to meet program rules.

Rights, data, accountability

- ☐ External requests for identifiable client data (PII) expand without clear governance, minimum-necessary limits, consent/notice, legal review, audit controls, or protocols for responding to law enforcement or other third-party requests.
- ☐ A technology or vendor platform plays a major role in access, prioritization, or decision-making.
- ☐ Mandated or involuntary pathways are included (holds/mandates/commitments) with unclear due process protections.
- ☐ Oversight and/or accountability structures are not clearly defined or missing altogether.

Part B — Assess Impact & Safeguards

Score the strength of safeguards and identify gaps.

Use this section to move from general concern to a more structured review. Score each indicator based on how strongly it is present and how well safeguards are defined. The score is not a scientific rating or a pass/fail test; it is a discussion guide to help identify where written plans, conditions, oversight, or alternatives may be needed.

Rate each item from 0 to 3. Multiply the score by the weight to arrive at the weighted score.

Note: These weights are intended to support discussion, not to serve as a validated scoring instrument. Communities may adjust weights based on local values, legal context, lived-experience input, and the seriousness of potential harms.

Add points for a total safeguards attention score.

- 0 = Not present / strong safeguards
- 1 = Emerging / partial safeguards
- 2 = Present / weak safeguards
- 3 = Strongly present / no safeguards

Suggested interpretation:

0–9 =	Monitor / Strong Safeguards: keep tracking and request regular reporting.
10–18 =	Conditions Needed: require conditions, written plans, and governance guardrails before proceeding.
19+ =	Significant attention to safeguards needed before moving forward: pause major commitments until the high-scoring items are resolved; consider alternatives.

Indicator	Weight	Score (0–3)	Weighted Score (weight x score)	Possible Pivot Point	Notes/Evidence
Enforcement expansion is a primary “solution” rather than a safety backstop.	1				
New funding is tied to enforcement/compliance metrics instead of housing outcomes.	1				
Housing/prevention funding is flat or reduced while congregate capacity expands.	1				
A large congregate facility (100+ beds) is positioned as the centerpiece response.	1				
Operations plan is incomplete (staffing ratios, training, 24/7 coverage, safety).	1				

Indicator	Weight	Score (0–3)	Weighted Score (weight x score)	Possible Pivot Point	Notes/Evidence
Exit pathways to housing are vague (no inventory plan, unrealistic throughput).	1				
Rules are high-barrier (sobriety/behavior compliance) without alternatives and appeals.	1				
Data sharing expands without clear governance, consent/notice, and audit controls.	2				
A private vendor platform is embedded in key decisions without transparency/oversight.	1				
Involuntary pathways are expanding (holds/mandates) without explicit due process safeguards.	2				
Independent oversight roles, authority, and review processes are not yet defined, including authority to review outcomes and unintended harms.	1				
The plan lacks clear sunset/reevaluation clauses and repurposing limits.	1				

Total safeguards attention score = $\Sigma(\text{score} \times \text{weight})$.

Part C — Identify Pivot Points & Constructive Next Steps

Ask stronger questions, propose conditions, and identify alternatives.

Use this section to decide what to ask, request, or propose next. These questions and actions can be used for:

- planning meetings,
- public comment,
- funding discussions,
- procurement processes,
- contract negotiations,
- implementation reviews, or
- community advocacy.

Focus on the next most critical decision point you can influence and the safeguards that would most improve outcomes for people experiencing homelessness.

1) Immediate triage: first 48 hours after learning of the proposal

- Request the operations plan in writing (staffing ratios, safety, medical/behavioral health, grievance/appeals, exit pathways).
- Ask for the planned outcome measures up front: housing exits, returns to homelessness, safety incidents, cost per successful housing exit.
- Identify one decision point you can influence (procurement, zoning, funding vote, RFP language, contract terms).

2) 6 High-Impact Review Areas

1. **Housing exits:** What is the expected average length of stay, and what housing inventory, subsidies, landlord partnerships, or move-on resources make that realistic?
2. **Services, staffing, and funding:** What staffing model is proposed, including ratios, qualifications, supervision, 24/7 coverage, safety roles, and training? What medical, behavioral health, substance use, detox, peer support, and housing navigation services will be available on-site or by formal partnership? Who pays for those services, and is the funding ongoing or one-time?
3. **Access, choice, and rules:** Is participation voluntary? Can participants freely come and go during the day? What rules could lead to denial, removal, or loss of services, and what lower-barrier alternatives are available?
4. **Rights and due process:** What guardrails protect civil rights, disability access, clinical decision-making, grievance rights, appeals, counsel or advocacy support where applicable, and protection from inappropriate involuntary pathways?
5. **Data, privacy, and accountability:** What data will be collected, where will it be stored, who can access it, what consent or notice is provided, and how will external data requests be handled?
6. **Success, oversight, and sunset:** What does success look like beyond utilization? Who reviews outcomes and unintended harms? What public reporting, independent oversight, reevaluation, sunset, or repurposing limits are built in?

3) Practical Adjustments to Strengthen Community Outcomes

- Request a written staffing plan and secured funding for minimum case manager ratios and planned training requirements.
- Urge for adoption of lower-barrier access, clear criteria for any denial or removal, a timely grievance/appeal process, and safe alternate temporary arrangements that are accessible, person-centered, voluntary, and connected to housing navigation.
- Articulate the need for independent oversight with authority, public dashboards, and regular harm-review.

- Request that the project participate in HMIS where appropriate and comply with CoC data governance requirements, including role-based access, audit logs, retention limits, vendor restrictions, consent/notice practices, and protocols for external data requests.
- Ask what the anticipated path for participants to exit to stable, sustainable permanent housing is.

4) Complementary or Alternative Approaches to Strengthen the Response

- Scale non-congregate shelter (motels/hotels/small sites) paired with housing navigation and flexible rental assistance.
- Increase permanent housing supply and subsidies (RRH, PSH, vouchers) and strengthen prevention/eviction diversion.
- Create smaller, specialized “bridge” programs (medical respite, behavioral health respite) that feed directly into housing.
- Invest in street outreach and crisis response that is not enforcement-led/punitive in nature, with clear referral pathways, warm handoffs, transportation support, voluntary engagement protocols, and separation between service access and citations, arrests, or involuntary pathways.
- Expand voluntary, community-based alternatives to institutionalization, such as medical respite, behavioral health respite, mobile crisis response, peer support, outpatient treatment partnerships, and housing-linked supportive services.