



SANTA CLARA UNIVERSITY

**INTERNATIONAL HUMAN RIGHTS CLINIC**

**Outline of Priorities for a Critical Action Plan on Unhoused Women and Girls  
for the Santa Clara County Board of Supervisors**

These recommendations have been developed through a comprehensive review of input from Supervisors Duong and Arenas at the September 10, 2025 CSFC meeting, the Commission on the Status of Women's (CSW) prior recommendations, Santa Clara University's 2018 report on unhoused women, and the empirical findings presented at the March 10, 2025 CSW Public Forum on Unhoused Women and Girls. Collectively, these sources underscore the urgent need for a coordinated, gender-responsive approach to addressing homelessness in Santa Clara County. The data reveal that economic insecurity is both a root cause and an accelerator of domestic violence, displacement, and prolonged housing instability. In light of the current context and resulting resource constraints upon the County, the following recommendations identify the most urgent measures for the County to prioritize for action.

Recommendations 1-3 arise primarily from the CSW's recommendations, while Recommendations 4-5 reflect the outcome of continued study of these issues by the International Human Rights Clinic at Santa Clara Law, in consultation with CSW members, and have not yet been approved by the full CSW.

Key:

**Blue** = previously recommended by CSW

**Green** = previously recommended by IHRC

**Purple** = shared language/overlapping content between IHRC and CSW

**Red** = new recommendation from October 6 meeting

- 1. Vehicle tows threaten the health, safety, and stability of unhoused women.**
  - a. Vehicle tows particularly affect survivors of domestic violence, who use their vehicles as a way of maintaining safety and are often accompanied by children.**
  - b. Vehicle tows also uniquely impact Latina women, many of whom are Spanish-speaking, undocumented, or have had their identification stolen by abusers. This vulnerable population faces language barriers, lack of access to services, and loss of essential documentation.**

**c. Vehicle tows also pose a major public health risk. Loss of the vehicle may subject women and children living in vehicles to loss of essential medication, unsanitary conditions, sleep deprivation, and chronic stress, all of which exacerbate physical and mental health challenges.<sup>1</sup>**

**Recommendations:**

- Recognize occupied vehicles as a form of emergency shelter.<sup>2</sup>
- Enact a prohibition on towing vehicles, including RVs and trailers, that are inhabited by people or are a form of emergency shelter or affordable housing.<sup>3</sup>
- Establish at least one women-only safe parking site with drinking water, sanitation, security, and case management that accommodates women with children.<sup>4</sup>
- Waive or subsidize towing fees for unhoused vehicle residents, and allow vehicle residents to park on County property to avoid tows when they are temporarily displaced.<sup>5</sup>

**2. Women with the most complex needs are often least likely to receive services because some service providers prioritize “easier” clients to maintain funding metrics.<sup>6</sup> Current funding requirements prioritize the efficiency with which service providers are able to move clients through the system.<sup>7</sup> As a result, women fleeing domestic violence face systemic service denials, particularly those women who are already unhoused or struggle with substance abuse. The County needs to develop service funding and provision approaches that address this disparity.**

---

<sup>1</sup> Santa Clara University International Human Rights Clinic, *Findings and Recommendations on Unhoused Women and Girls*, 3-4, app. A (Sept. 8, 2025) (explaining that the sudden loss of a vehicle due to towing can interrupt medication routines, prenatal or postnatal care, and case management services, forcing survivors to return to unsafe environments or street encampments).

<sup>2</sup> *Id.* at 3 (describing how vehicle towing policies disproportionately endanger women, particularly survivors of domestic violence and mothers, by removing their primary means of safety, stability, and transportation).

<sup>3</sup> *Id.* at app. A.

<sup>4</sup> *Id.* at 4.

<sup>5</sup> *Id.*

<sup>6</sup> Santa Clara Univ. Int'l Hum. Rts. Clinic & Office of Women's Policy, *County of Santa Clara Gender and Homelessness Study* (2018) (documenting that women with mental illness or substance use disorders are at higher risk of violence and less likely to receive help, also describing service gaps for women who are survivors of domestic violence and citing the CEDAW Task Force/Blue Ribbon Report on Domestic Violence recommendations which identify that the County's provider and funding systems incentivize selective service and fail to meet the needs of the most vulnerable).

<sup>7</sup> Santa Clara Cnty. Off. of Supportive Hous., *Gender-Based Violence Services – Service Providers FY 2025-2026*, in *Children, Seniors, and Families Comm. Agenda Packet* 84 (Sept. 10, 2025) (on file with the Santa Clara Cnty. Clerk of the Bd. of Supervisors) (noting the presence of quantitative performance benchmarks in County funding and contracting documentation).

## Recommendations:

- Add clear funding requirements to County grants to ensure that contracted agencies cannot deny services to high-needs survivors.<sup>8</sup>
  - Change deliverables and other funding metrics for County programs so that service providers can help individuals with complex needs, including those with co-occurring challenges, without risking the loss of critical funding.<sup>9</sup>
- Develop a plan to eliminate service access and treatment gaps for unsheltered people struggling with chronic and severe mental illness, applying a gender-sensitive, trauma-informed approach..
  - Increase the number of mobile crisis teams with clinical staff, and expand their hours, to support individuals experiencing severe mental health and substance use crises. Ensure female providers are available for unhoused women experiencing trauma. Provide opportunities for women with lived experience to provide peer-to-peer support.
  - To provide continuity of care, increase the number of beds available for substance use treatment and provide follow-up supportive services to prevent relapse. Increase access to mental health treatment at all points of contact, including providers who are trained in trauma-informed care and support for survivors of domestic violence and sexual assault.
- Create a Guaranteed Basic Income Program for survivors of domestic violence and sexual assault with complex needs, consolidating their access to services while providing flexible funding.<sup>10</sup>

---

<sup>8</sup> *County of Santa Clara Gender and Homelessness Study*, supra note 6, at 63-64 (documenting service denials and barriers faced by survivors with complex needs, including those experiencing domestic violence, substance-use disorders, and mental-health challenges).

<sup>9</sup> Santa Clara Cnty. Off. of Supportive Housing, *Gender-Based Violence Services – Service Providers FY 2025-2026*, in *Children, Seniors, and Families Comm. Agenda Packet*, 84 (Sept. 10, 2025) (on file with the Santa Clara Cnty. Clerk of the Board of Supervisors).

<sup>10</sup> Women experiencing homelessness or housing instability often face overlapping challenges that make traditional service models difficult to access or sustain. Survivors of domestic violence and sexual assault may be coping simultaneously with trauma, mental-health, or substance-use issues, loss of employment or child custody, and the fear of deportation or discrimination related to immigration status. Limited English proficiency and lack of culturally responsive case management further complicate access to benefits and stable housing. A guaranteed basic-income program targeted to survivors with complex needs would provide flexible, immediate support while reducing the administrative burden of navigating multiple systems for food, health care, childcare, and safety assistance. See *County of Santa Clara Gender and Homelessness Study*, supra note 6, at 41-42.

**3. Women struggle to navigate County systems and access programs and services to meet their needs in a comprehensive manner.<sup>11</sup> To support the various departments that serve women navigating County programs and services, the County would benefit from increased interdepartmental coordination. Such coordination would lead to more consistent support, more efficient responses, and better outcomes. Overlapping services across various departments are often hard for women to navigate because the burden of coordination falls on the individual.<sup>12</sup>**

- a. The Violence Against Women Act (VAWA) provides an underutilized framework Santa Clara County can leverage to protect survivors of domestic violence who face homelessness after fleeing abuse. VAWA ensures survivors cannot be denied or evicted from federally funded housing due to violence committed against them and supports flexible, trauma-informed housing programs. By integrating VAWA protections across all County housing and homelessness systems, the County can prevent survivors from being penalized for the violence they have endured and ensure safety remains central to housing placement decisions.**
- b. We recommend the County strengthen coordination between the Office of Supportive Housing, domestic violence service providers, and legal advocates to establish clear emergency transfer pathways, survivor-centered housing navigation, and training for all direct service staff (specifically the Housing Authority) on VAWA compliance. Dedicated VAWA funding could further expand rapid rehousing, peer navigation, and culturally specific programs. Together, these measures would advance the County's goals of equity, safety, and stability for those most at risk.**

**Recommendations:**

- Building upon the existing Continuum of Care, create a referral system where unhoused residents can access information and County services, including available temporary housing and homeless services.<sup>13</sup>
- Increase coordination between agencies engaging people living in encampments to ensure consistent and humane approaches to encampment resolutions; build consideration of the unique challenges faced by unhoused women and girls in encampment sweeps into this

---

<sup>11</sup> As it currently stands, support for unhoused women is scattered across departments, including the Office of Supportive Housing, Child Protective Services, Housing Authority, Behavioral Health, and other nonprofit organizations. Women report gaps in service as they struggle to navigate this complex system. Greater interdepartmental coordination would therefore help women to navigate the various County services available to them and ensure continuity of support.

<sup>12</sup> One woman reported being “sent from shelter to shelter” despite pleading for assistance for herself and her children, illustrating how navigating multiple programs with differing eligibility and intake processes can be overwhelming for women with complex needs. Santa Clara Univ. Int’l Hum. Rts. Clinic & Off. of Women’s Pol’y, County of Santa Clara Gender and Homelessness Study, 63 (2018).

<sup>13</sup> *Findings and Recommendations on Unhoused Women and Girls*, supra note 1, at 2 (Sept. 8, 2025).

effort, including by centering the voices of those with lived experience. Apply the same model to a coordinated effort to improve shelter standards for emergency shelters to increase health and safety for all women, particularly women who are survivors of inter-personal violence and sexual assault, and women with children.

- Expand or replicate Destination: Home's flexible spending program that empowers frontline workers to rapidly address essential survivor needs, including temporary housing, document replacement, and legal fees.<sup>14</sup>
  - Integrate legal services with case-management systems through partnerships with providers such as the Law Foundation of Silicon Valley or Santa Clara University's Katharine & George Alexander Community Law Center.<sup>15</sup> Additionally, ensure that such legal services include housing rights under the Violence Against Women Act (VAWA) and the Americans with Disabilities Act (ADA).
  - Prioritize access to legal services for women with child welfare cases, particularly where a lack of stable housing is the primary reason for the potential loss of custody.<sup>16</sup> Engage relevant agencies in collaborative discussions to develop policies to address housing insecurity before removing children from the home in such situations.
  - Prioritize women-headed households; allow money to be spent in more flexible ways to allow women to meet their basic needs.
- Establish mobile housing navigation teams with domestic violence advocates to support survivors who are fleeing and living in cars, encampments or motels.
- Leverage the Violence Against Women Act (VAWA) to improve continuity of services for unhoused women who are survivors of inter-personal violence and/or sexual assault.
  - Train all County-funded homelessness staff and subcontractors on VAWA rights, safety planning, and trauma-informed care. Coordinate with the Governor's Office of Emergency Services VAWA programs for housing, advocacy, and cross-sector collaboration.
  - Train housing authorities and landlords on VAWA rights, emergency transfers, and documentation standards to reduce unlawful denials or evictions.
  - Expand emergency transfer policies between County-funded shelters, rapid rehousing, and permanent supportive housing to allow survivors to move quickly and safely without losing their subsidy or waitlist position.
  - Allow women in sober living for more than ninety days to remain eligible for housing services. In cases of co-occurring domestic violence and substance use disorder, leverage VAWA and ADA accommodations to ensure housing continuity and encourage treatment without sacrificing housing stability.

---

<sup>14</sup> Santa Clara Cnty., *Community Plan to End Homelessness 2020-2025*, 11-20 (2020).

<sup>15</sup> *Findings and Recommendations on Unhoused Women and Girls*, supra note 1, at 4.

<sup>16</sup> *County of Santa Clara Gender and Homelessness Study*, supra note 6, at 64.

- Embed domestic violence specialists in existing County homeless outreach teams (e.g. Heading Home, PATH, or LifeMoves) to identify survivors early and connect them to wraparound services including protection orders, confidential shelters, and trauma-informed support.

## **New Recommendations for Critical Action Plan on Unhoused Women and Girls for the Santa Clara County Board of Supervisors**

Key:

**Blue** = previously recommended by CSW

**Green** = previously recommended by IHRC

**Purple** = shared language/overlapping content between IHRC and CSW

**Red** = new recommendation from October 6 meeting

- 4. Given the outsized role that domestic violence plays in driving women into homelessness, County programs should address the root causes of domestic violence and the effects of gender stereotypes, and effectively hold perpetrators accountable. When violence is prevented at its source, survivors experience greater stability and the County can more effectively allocate its resources towards prevention and recovery.**

### **Recommendations:**

- Develop a county-level initiative or study on perpetrator accountability and intervention programs
- Sponsor a state bill funding perpetrator rehabilitation efforts or intervention programs.
- Utilize existing academic data (e.g. [UCLA substudy<sup>17</sup>](#)) to evaluate current program outcomes

- 5. In certain situations where a child is removed from custody due to housing instability, a more effective and sustainable resolution may be achieved by mobilizing a targeted intervention to restore housing rather than separating the family. In such cases, the resources of Child Protective Services (CPS) could be better leveraged to address both child and family well-being by preventing homelessness and family separation.**
  - a. By aligning CPS funding priorities with homelessness-prevention and domestic violence recovery programs, the County can promote a whole-family approach that reduces unnecessary trauma and fosters lasting stability.**

---

<sup>17</sup> A 2022 UCLA study on vehicular homelessness found that women and families with children make up a disproportionate share of those living in vehicles. This reflects the gendered nature of housing loss and the failure of upstream domestic violence prevention systems. These findings underscore the need for County programs to address the root causes of violence, including perpetrator accountability, to prevent women and children from falling into homelessness.

Recommendations:

- Employ DV-certified social workers in CPS to manage family safety cases.<sup>18</sup>
  - Train CPS caseworkers on housing resources and culturally-appropriate, linguistically-accessible trauma-informed, gender-responsive approaches to family stabilization.<sup>19</sup>
  - Train CPS and OSH staff on applying the Violence Against Women Act (VAWA) and Americans with Disabilities accommodation requests.
  -
- Strengthen the Homeless Prevention System (HPS) with a gender-responsive lens by aligning CPS and homelessness prevention efforts to address the interconnected needs of mothers and their children. This should include leveraging existing CPS funds and reprioritizing current County funding allocations in order to ensure that the system adequately funds housing, case management, and supportive services for unhoused and housing-insecure women with children.<sup>20</sup>
  - Redirect funds, such as AB 109 funds, toward family-preservation and DV-recovery programs.<sup>21</sup>
  - Require CPS to allocate funding for wraparound services for mothers, including housing, employment support, and therapy. In the alternative, create a partnership between CPS and OSH to ensure that mothers at risk of losing custody due to housing insecurity receive emergency housing assistance to allow them to retain custody where appropriate.<sup>22</sup>
- Facilitate collaboration between CPS and OSH to ensure housing and protection policies align.
- Conduct a pilot policy-conflict study to identify and correct barriers between CPS, OSH, and the Housing Authority.
- Pilot a voucher program that prioritizes mothers at risk of losing custody due to housing insecurity.<sup>23</sup>

---

<sup>18</sup> Santa Clara University International Human Rights Clinic, *Findings and Recommendations on Unhoused Women and Girls*, 3 (Sept. 8, 2025).

<sup>19</sup> *Id.* at 4.

<sup>20</sup> Santa Clara County, *Community Plan to End Homelessness 2020-2025*, 11-13 (2020).

<sup>21</sup> *Findings and Recommendations on Unhoused Women and Girls*, supra note 2, at 5.

<sup>22</sup> Santa Clara University International Human Rights Clinic & Office of Women's Policy, *County of Santa Clara Gender and Homelessness Study*, 63-64 (2018) (reporting that women avoid services due to fear of losing custody and recommending integrated, wraparound support).

<sup>23</sup> *Id.* at 64.