

WOMEN BEYOND BARS: REENTRY AND HUMAN RIGHTS

PREPARED BY:

THE CALIFORNIA INSTITUTION FOR WOMEN THINK TANK AND THE UCLA LAW SCHOOL INTERNATIONAL HUMAN RIGHTS CLINIC

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PROJECT CO-DIRECTORS: PROFESSORS E. Tendayi Achiume and Bryonn Bain

ADDRESSED TO:

THE LOS ANGELES MAYOR'S OFFICE OF REENTRY AND ALL LOCAL, STATE, AND FEDERAL AUTHORITIES WITH RESPONSIBILITIES TO WOMEN REENTERING
LOS ANGELES COMMUNITIES

Special thanks are due to the following former UCLA Law students, who drafted the Report under the supervision of
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Gina Hong
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Thanks are also due to the following former and current UCLA Law students, who finalized the report for publication under the
supervision of Professors E. Tendayi Achiume, Joseph Berra, Todd Schneider and the Promise Institute for Human Rights Fellow,

Sarah Khanghahi:
Daniel Johnson
Abigail Kerfoot
Léa Kogan
Ralph Madlalate
Sarah Rahimi
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Nicole Van Zyl

This Report was researched and drafted in the Fall of 2016 and finalized for publication in 2018. It analyzes Los Angeles reentry policy as
of Fall 2016, unless it explicitly states otherwise.

COVER IMAGE:

Epiphany, 2010. Banner project led by Minotte Romulus at Spectrum Detention, Dorchester, MA.

This artwork was created in Artistic Noise's studio art program. Artistic Noise exists to bring the freedom and power of artistic practice
to young people who are incarcerated, on probation, or otherwise involved in the justice system. www.artisticnoise.org

CONTENTS

Glossary 5

About the Authors 6

Meme’s Story 7

Executive Summary 9

Methodology 22

SECTION I—Reentry: The Landscape, The Lives, The Laws 27

 A. The Landscape: Reentry, Housing, and Employment 27

 B. The Lives: Women and Reentry 31

 C. The Laws: Local Implementation of Human Rights 32

SECTION II—Reentering Women’s Human Rights to Housing and Employment 37

 A. Human Rights-Based Approach to Reentry 37

 B. Reentering Women’s Human Right to Housing 43

 C. Right to Employment for Women Returning to Los Angeles 49

SECTION III—Assessing Los Angeles’s Compliance with Human Rights 57

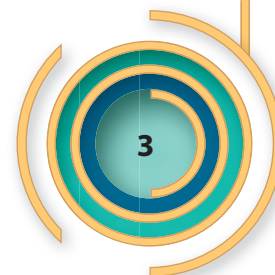
 A. Housing: Policy Versus Reality 57

 B. Employment: Policy Versus Reality 71

Conclusion and Recommendations 84

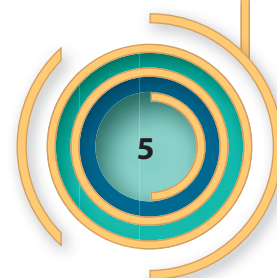
Appendix A—CIW Think Tank Narratives 90

Appendix B—Reentry Resource Guide 94



GLOSSARY

ANWOL	A New Way of Life
ARC	Anti-Recidivism Coalition
CALPIA	California Prison Industry Authority
CBO	Community-based organization
CCTRP	Custody to Community Transitional Reentry Programs
CDCR	California Department of Corrections and Rehabilitation
CEDAW	United Nations Convention on the Elimination of All Forms of Discrimination Against Women
CEDAW Ordinance	City of Los Angeles Ordinance No. 175735
CIW	The California Institution for Women
CIW Think Tank	California Institution for Women Think Tank
CoFFE	National Cooperative of Felon-Friendly Employers (CoFFE)
Community Partners	The Community Partners of the CIW Think Tank
FOTEP	Female Offender Treatment Program
HACLA	Housing Authority of the City of Los Angeles
HACOLA	Housing Authority of the County of Los Angeles
HUD	United States Department of Housing and Urban Development
ICCPR	International Covenant on Civil and Political Rights
ICESCR	International Covenant on Economic, Social and Cultural Rights
ICESCR Committee	The Committee on Economic, Social, and Cultural Rights
IHRC	International Human Rights Clinic at the UCLA School of Law
LA:RISE	Los Angeles Regional Initiative for Social Enterprise
Mayor's Office of Reentry	Los Angeles Mayor's Office of Reentry
UCLA	University of California, Los Angeles
UDHR	Universal Declaration of Human Rights
UNSMR	United Nations Standard Minimum Rules for the Treatment of Prisoners



ABOUT THE AUTHORS

THE CIW THINK TANK

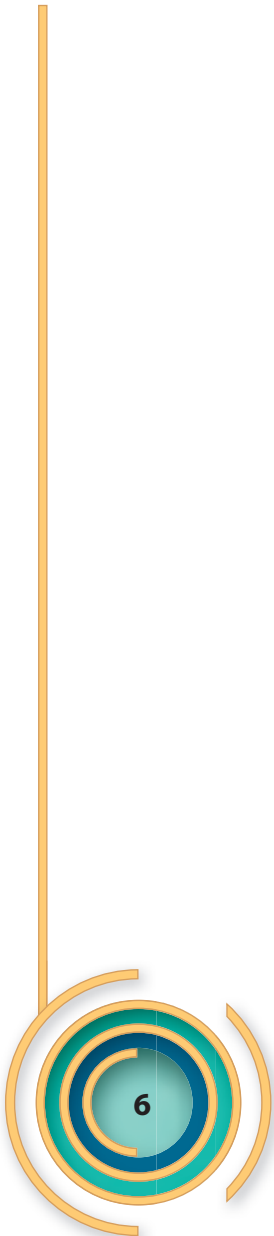
The CIW Think Tank (or the Think Tank) is a group of women currently and formerly incarcerated at the California Institution for Women (CIW) that seeks to ensure the successful reentry of women paroling from prison. It endeavors to design bridges connecting incarcerated communities with the public to pursue successful reentry through education and the arts.

In the Fall of 2015, a number of incarcerated women wrote letters to UCLA expressing the need for a bachelor's degree program at CIW. As a result of these efforts, twelve women were chosen to participate in an initial meeting with CIW and UCLA administrators, professors, and staff. A representative of the Mayor's Office of Reentry was also present. One result of this meeting was the creation of the CIW Think Tank.

The CIW Think Tank is comprised of women of different ages, ethnicities, and socioeconomic and academic backgrounds. This diversity of membership ensures that women from a variety of communities have a voice in meetings and consultations. Beginning in October 2015, UCLA staff met regularly with the CIW Think Tank for some years to develop the UCLA Bachelor's Degree Program and oversee, assess, and evaluate the development of UCLA's current prison education program at CIW.

UCLA SCHOOL OF LAW INTERNATIONAL HUMAN RIGHTS CLINIC

The UCLA School of Law International Human Rights Clinic (the IHRC) trains students in the theory and practice of human rights law under the supervision of international human rights law faculty. IHRC students collaborate with international and domestic organizations on a variety of projects each semester, providing legal, policy, and advocacy expertise to those seeking to advance social justice through a human rights frame.



MEME'S STORY

The following essay by Meme—a member of the CIW Think Tank—provides a window into the experiences and motivations that drove the CIW Think Tank to claim a central role in reshaping reentry policy for women returning to Los Angeles communities following release from incarceration.

I come from South Central Los Angeles. My neighborhood is Broadway and 52nd Street. Where I grew up, selling dope, prostitution and violent crime happen all the time. Nine out of ten mothers were on crack. Everyone's fathers were gone, in prison, or dead. It seemed like every man around had been touched by the criminal justice system. Even eight out of ten women had spent time in the penitentiary, with most of them having served multiple terms. All of us kids shared the same story, so we understood each other. All of us grew up in families relying on AFDC, section 8, or dope sales to provide for us. Our friendships offered the support that was lacking at home. Most of the kids in my neighborhood dropped out of school by junior high.

As for me, I loved school and learned quickly. I took pride in bringing home a report card filled with A grades. At least until my mom developed a crack habit and stopped providing for me. I guess I shouldn't have been surprised. My mom had four sisters and one brother, and only one of the entire group worked; the rest smoked crack. My entire world was turned upside down. I had to go to school without the clothes and the fresh new shoes that the other kids wore. I got teased all the time. My dad had just come home from prison and was getting too old to make money robbing banks like he had in the past. He was locked up from the time I was six months old until I turned ten. Then he was home for a few months and got locked right back up. When he paroled again, I was twelve years old and my life was crumbling around me. After a life of fast money, it was too hard for him to get on SSI. He just wasn't that type of man. Instead, he started drinking and didn't stop until he was dead. My focus shifted to survival. I dropped out of school in the seventh grade. It was easier to sell dope, gangbang, and get money than to spend my time somewhere that I didn't belong. I started drinking at the age of twelve. My life followed the same path as the rest of the kids in my neighborhood: hopelessness and crime.

When I came to prison, I was scared. I couldn't believe that I had fifteen years to serve. From the beginning of my sentence, I made a decision that I wasn't going to return to my community as the same woman who left. You see, I was all too familiar with the challenges that face most women returning to the neighborhood: nowhere to live, no money from the county because of drug convictions, no prospect of a job. All of that adds up to a rapid return to what you know: selling drugs and making money. How else can a person survive? Where I live, there are no jobs for anyone, let alone a parolee. Women with children to support have an even tougher time. The first thing they want to do is get their kids back and provide for them. The burden of supporting a family is overwhelming when you can't even care for yourself. Plus, if you leave behind children, by the time you come home they are either gangbanging or in the system. I had to make a different

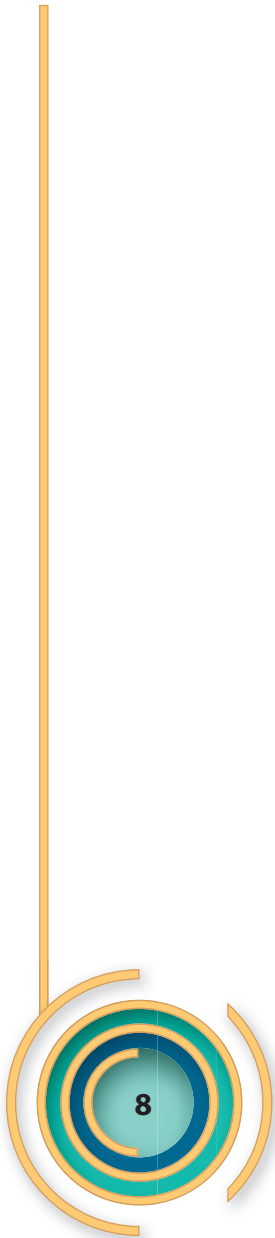
“When I came to prison, I was scared. I couldn't believe that I had fifteen years to serve. From the beginning of my sentence, I made a decision that I wasn't going to return to my community as the same woman who left.”



ending for my story. My strategy to make that happen was education. I wanted to become a role model for my son. I buckled down and quickly earned my G.E.D. Shortly after, I had the chance to join the CIW Think Tank. Being exposed to faculty from UCLA showed me that there were opportunities available to me. I enrolled in Chaffey College and am currently working towards my A.A. degree. The education that I receive in prison will serve as a stepping stone towards my future. I know that I can earn a degree, get a job, and find safe housing. One of the major factors in my success has been the women that have mentored me along the way. I plan to go to transitional housing when I parole. That will allow me to meet my survival needs while I get on my feet. I believe that having a place to stay will afford me the ability to find a job before I am forced to make tough choices to survive.

The main obstacles that I believe prevent women from succeeding at reentry are: they are so enmeshed in the criminal lifestyle that they don't believe change is possible; they are homeless and possibly forced to live in an abandoned house with many other people; they don't have the option of finding a job because no jobs are available in the community.

When women are released back to my neighborhood, I think certain strategies would help them to avoid recidivating. Parole agents should match each returning woman with a mentor for the first six months of supervision. This mentor would offer hands-on help with job searching and interviews. It is scary to try something new, and the mentor would act as living proof that change is possible. Also, help with transportation is necessary for finding a job and connecting with available services. It is important for women to find work immediately, because if they have a home and are in jeopardy of losing it, they will do whatever it takes to make money. Each woman needs access to safe, supportive and drug free housing. A person has to be clean and neat to find a job, so clothes and a place to live are necessary. Lastly, women should not have the responsibility of caring for their children immediately, because it is too stressful and will interfere with their focus on changing their lives.



EXECUTIVE SUMMARY

The central purpose of “Women Beyond Bars: Reentry and Human Rights” (the Report),¹ is to explain what adopting a human rights approach to reentry means for the women of Los Angeles, the City of Los Angeles, and other local government authorities responsible for the reentry landscape in Los Angeles, specifically as it relates to housing and employment. The human rights framework not only provides reentering women with the means and vocabulary to articulate their dreams for a just and equitable city; it also produces suggestions and policy recommendations for government actors, whose obligation it is to ensure the fulfillment of human rights. Accordingly, the Report represents a current statement of the lived realities of formerly incarcerated women and contemporary human rights norms, which bind the City of Los Angeles in fulfilling its duties to incarcerated women. Finally, the Report also provides a practical guide to reentry resources in Los Angeles, based in part on consultations with community partners engaged on a daily basis in providing reentry support to incarcerated and formerly incarcerated women.

The Federal Interagency Reentry Council defines reentry as “the transition from incarceration—life in prison, jail, or juvenile justice facilities—to life in the community.”

BACKGROUND

“It is clear that the incarceration of women is not rehabilitative, but instead thwarts recovery. . . . Societal pressures are in a large part responsible for the incarceration of women. . . . During incarceration, women are not healed, but instead are subjected to further trauma. The current conditions of incarceration are contrary to reformation and growth, and instead encourage continued drug use and criminality. Given this information, major changes are needed.”²

Paige Linville, CIW Think Tank Member

The Federal Interagency Reentry Council defines reentry as “the transition from incarceration—life in prison, jail, or juvenile justice facilities—to life in the community.”³ Reentry, however, is not simply a transition from point A to point B: it is a complex social process characterized by pervasive barriers. It occurs in the context of historically rooted structures of racial inequality that today disproportionately subject communities of color to over-policing and mass incarceration. The United States constitutes less than five percent of the world’s population, but it is home to

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- 1 The full report is available at the website of the UCLA School of Law International Human Rights Clinic at <https://law.ucla.edu/academics/clinical-and-experiential-programs/international-human-rights-clinic/> [<http://bit.ly/UCLAIHRC>].
 - 2 Paige Linville, CIW Think Tank, *Criminalization of Trauma*, at 5 (June 3, 2016) (highlighting the extent to which criminal justice-involved women deal with trauma before, during, and after a sentence).
 - 3 FED. INTERAGENCY REENTRY COUNCIL, *THE FEDERAL INTERAGENCY REENTRY COUNCIL: A RECORD OF PROGRESS AND A ROADMAP FOR THE FUTURE* 3 (2016).



In California, nearly 10,000 women are released from carceral facilities operated by the state each year. Over twenty-two percent of women released in California recidivate within one year—a clear sign that the systems currently in place do not prepare women for release.

more than twenty percent of the world’s incarcerated population: one in three adults in the U.S. has a criminal record.⁴ In Los Angeles specifically, of the 42,750 people in prison, over 90 percent are people of color.⁵

Over the past several decades, the rate of increase in the incarceration of women has been double that of men.⁶ In California, nearly 10,000 women are released from carceral facilities operated by the state each year.⁷ Over twenty-two percent of women released in California recidivate within one year⁸—a clear sign that the systems currently in place do not prepare women for release. In Los Angeles, over seventy percent of women are women of color,⁹ and a quarter of the women in the city do not even have a high school degree.¹⁰ The facts surrounding recidivism must be understood in the context of overlapping intersectional systems of oppression, including race and class, affecting women in LA. Recidivism is a structural feature of reentry policies that do little to rectify the inequalities that built our criminal injustice system.¹¹

Against this backdrop, the CIW Think Tank (or The Think Tank) identified housing and employment as two urgent priorities that serve as the focal points of the Report, which was researched and drafted in the fall of 2016, and finalized for publication in the fall of 2018. The reentry vision articulated in the Report explains the existing human rights standards applicable to housing and employment for reentering women and recommends steps that the Mayor’s Office of Reentry and other public authorities must take to realize women’s rights fully. Los Angeles has the most unaffordable housing market in the nation, surpassing even New York and San Francisco.¹² And in Los Angeles, about eighty percent of employers refuse to hire applicants with prior convictions.¹³ Although the United States justifies incarceration as rehabilitative and expects individuals coming out of the system to fully participate in society upon reentry, it has largely failed to prepare

4 *Id.*

5 *Los Angeles County*, CAL. SENTENCING INST., <http://casi.cjic.org/data/2016-adult.xlsx> (last visited Sept. 27, 2018).

6 FED. INTERAGENCY REENTRY COUNCIL, *supra* note 3, at 6.

7 CAL. DEP’T CORR., OFFICE OF RESEARCH, OUTCOME EVALUATION REPORT (2016) at 6.

8 *Id.* at 16.

9 CITY OF L.A., OFFICE OF THE MAYOR, REPORT ON THE STATUS OF WOMEN AND GIRLS IN THE CITY OF LOS ANGELES: PART 4 EDUCATION AND WORKFORCE DEVELOPMENT (2015) at 8.

10 *Id.* at 8.

11 Taylor L. Hall et al., *Postincarceration Policies and Prisoner Reentry: Implications for Policies and Programs Aimed at Reducing Recidivism and Poverty*, 20 J. POVERTY 56, 63 (2016) (discussing the consequences of post-incarceration policies).

12 ROSALIE RAY ET AL., UCLA LUSKIN SCH. OF PUB. AFFAIRS, IMPACTS OF THE WIDENING DIVIDE: LOS ANGELES AT THE FOREFRONT OF THE RENT BURDEN CRISIS 1 (rev. 2014), <http://www.anderson.ucla.edu/Documents/areas/ctr/ziman/2014-08WPrev.pdf>.

13 Michael A. Stoll & Shawn D. Bushway, *The Effect of Criminal Background Checks on Hiring Ex-Offenders*, 7 CRIMINOLOGY & PUB. POL’Y 3 371, 383 (September 2008).

criminal justice-involved individuals for the workforce.¹⁴ The importance of the Report's focus on housing and employment is underscored by studies demonstrating that post-release homelessness and unemployment are correlated with increased rates of recidivism.¹⁵

THE CITY OF LOS ANGELES'S COMMITMENT TO THE HUMAN RIGHTS OF WOMEN

*"Human rights should matter everywhere because we are all connected. For a community to survive, there must be a decent level of human rights so that it does not disintegrate into a predator/victim model. In my experience of incarceration, it is amazing what a demonstration of human dignity can have and the impact it can have on a broken individual."*¹⁶

CIW Think Tank Member

In 2003, the City of Los Angeles adopted an Ordinance to provide for the implementation of the United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), which provides a legal basis for the city to implement the standards set by CEDAW within its jurisdiction.¹⁷ In adopting this ordinance, the City of Los Angeles has committed to the local implementation of an instrument that guarantees equality for women and girls in all areas of their lives. This requires, among other things, a human rights-based approach to creating and implementing housing and employment policies for reentering women.

The Report sheds light on what is necessary for the realization of substantive equality for women, through an analysis of the broader international human rights framework. To give full meaning to the human rights protections in the CEDAW Ordinance, public authorities must understand the true meaning of human rights, including as this meaning is explained in fundamental international human

The City of Los Angeles has committed to the local implementation of an instrument that guarantees equality for women and girls in all areas of their lives.

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- 14 See Carla Rivera, *Four Prisons in California to Get Community College Programs*, L.A. TIMES (Aug. 5, 2015), <http://www.latimes.com/local/education/la-me-pell-inmate-column-20150805-story.html> ("More than 700,000 [individuals] are released each year, a significant but marginalized population frequently unprepared for life on the outside, with few skills and often without a high school diploma. College-level instruction on the inside is mostly a patchwork of correspondence courses and privately-funded in-house programs staffed by volunteers.").
- 15 See, e.g., Nally, et al., *Post-Release Recidivism and Employment Among Different Types of Released Offenders: A 5-Year Follow-up Study in the United States*, 9 INTERNATIONAL JOURNAL OF CRIMINAL JUSTICE SCIENCES 16 (2014); Lutze, et al., *Homelessness and Reentry: A Multisite Outcome Evaluation of Washington State's Reentry Housing Program for High Risk Offenders*, 41 CRIMINAL JUSTICE AND BEHAVIOR 471 (2014); Katharine H. Bradley, et al., *No Place Like Home: Housing and the Ex-Prisoner*, CMTY. RES. FOR JUST. (2001), http://b.3cdn.net/crjustice/a5b5d8fa98ed957505_hqm6b5qp2.pdf (noting that "[h]ousing is the [i]nchpin that holds the reintegration process together.").
- 16 Interview by Linda of Leslie, *infra* Appendix A.
- 17 CITY OF L.A., CAL., Ordinance 175735 (2003), implementing the provisions of the Convention on the Elimination of All Forms of Discrimination Against Women, G.A. Res. 34/180, art. 11, U.N. Doc. A/34/46 (Sept. 3, 1981).

rights instruments such as the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR).

APPLYING A HUMAN RIGHTS APPROACH TO REENTRY

“My vision is that L.A. City have a relationship with the prison . . . I would like to see the community redefine who is coming out and back into their communities: let the public know that they have been rehabilitated.”¹⁸

CIW Think Tank Member

The CIW Think Tank led the process of giving voice to the principal concerns of incarcerated women anticipating reentry in Los Angeles and consulted with other women incarcerated at CIW to provide the insights that are incorporated in the Report. As a result, its production manifests one of its central claims: participation from directly affected populations is essential to the actualization of human rights. This work was completed through the UCLA Prison Education Program at CIW, which seeks in part to equip women for re-entry by providing higher educational opportunities while they are incarcerated. Students in the IHRC drafted the Report with the CIW Think Tank’s direction, under the supervision of Professor E. Tendayi Achiume, who co-directed this project with Professor Bryonn Bain.

During the fall 2016 semester, the IHRC traveled twice a month to CIW to meet with the Think Tank to develop this Report. Through consultations with each other and with other women incarcerated at CIW, members of the CIW Think Tank articulated their understanding of the most pressing needs that women face upon reentering Los Angeles, focusing on the areas of housing and employment. In turn, the IHRC team conducted interviews with community partners and other stakeholders, as well as secondary research on Los Angeles’s reentry landscape and the applicable international human rights standards. The Report was written during this period based on these consultations, and it was ultimately finalized in 2018.

Together, the CIW Think Tank and the IHRC applied their respective expertise to the issues at the center of this Report to identify the steps that the Mayor’s Office of Reentry and other public actors in Los Angeles must take to fulfill the human rights to housing and employment of reentering women.

18 Interview by Linda of Leslie, *infra* Appendix A.

REENTRY, HUMAN RIGHTS, AND HOUSING

“Each woman needs access to safe, supportive and drug-free housing.”¹⁹

Meme, CIW Think Tank Member

In the CEDAW Ordinance, the City of Los Angeles commits “to ensure, on the basis of equality between men and women the right to equal access to housing.”²⁰ It further states that “it is the goal of the City of Los Angeles to implement the principles underlying CEDAW by addressing discrimination against women in housing.”²¹ This commitment to CEDAW’s underlying principles should be understood by local government authorities to require that they respect and promote women’s human rights in a way that ensures maximum access to this basic human necessity. Under international human rights law, the right to adequate housing has at least seven characteristics: security of tenure, availability of services, affordability, accessibility, cultural adequacy, location, and habitability.²² The first five are highlighted and examined in the Report. Among these, women’s access to housing is first and foremost determined by affordability and accessibility. Affordability means that the cost of housing must not compromise one’s ability to afford other necessities and must be commensurate with income levels. Accessibility requires that state actors remove barriers to accessing housing, especially those that affect vulnerable groups. Vulnerable groups should be ensured some degree of priority consideration in the housing sphere. Access should additionally be enhanced through dedication to education, empowerment, and access to information.

The ability of individuals to be self-sufficient and attain an adequate standard of living cannot be divorced from the right to work.

REENTRY, HUMAN RIGHTS, AND EMPLOYMENT

The ability of individuals to be self-sufficient and attain an adequate standard of living cannot be divorced from the right to work. This is especially true of vulnerable populations subject to exclusionary and discriminatory policies that impede them from entering the labor market. Article 11 of CEDAW states that the right to work is “an unalienable right of all human beings,” and requires state parties to take measures to eliminate discrimination related to employment.²³ International human rights law further requires fulfillment of three major elements in order to ensure the right to work: (1) availability, (2) accessibility, and (3) acceptability and quality.²⁴ This means that decent work must be available and

19 Meme’s Story at 2.

20 Ordinance 175735, *supra* note 17.

21 *Id.*

22 U.N. Comm. on Econ., Soc., & Cultural Rights, General Comment 4 on the Right to Adequate Housing (Art. 11 (1) of the Covenant), para. 12, U.N. Doc. E/1992/23 annex III at 91 (Dec. 13, 1991).

23 Convention on the Elimination of All Forms of Discrimination Against Women, G.A. Res. 34/180, art. 11, U.N. Doc. A/34/46 (Sept. 3, 1981).

24 U.N. Comm. On Econ., Soc., & Cultural Rights, General Comment 18 on the Right to Work, para. 12(c), U.N. Doc. E/C.12/GC/18 (Nov. 24, 2005).

accessible to everyone, irrespective of gender, race, sex, disability status, among others, and public authorities must provide the information necessary to secure employment.

ASSESSING LOS ANGELES'S COMPLIANCE WITH HUMAN RIGHTS STANDARDS ON HOUSING AND EMPLOYMENT FOR REENTERING WOMEN

Housing

According to the findings of the Think Tank and the IHRC, for incarcerated women preparing to reenter society, adequate housing is a key determinant of successful reentry. In accessing housing, reentering women might use either transitional housing programs, public housing or private rentals. Each has its own challenges. Common concerns women raised across the various options are:

- challenges of reuniting with children and families;
- unaddressed and unmanaged trauma;
- insecurity of tenure due to restrictive policies, or arbitrary exclusions; and
- threats created by social environment in the communities to which they return, which make it difficult for these women to avoid recidivism.

The Housing Authority of the City of Los Angeles (HACLA) administers the United States Department of Housing and Urban Development (HUD's) housing programs within the city limits of Los Angeles. This includes federally administered public housing and the Section 8 voucher program. Both of these programs have strict eligibility guidelines for persons with past criminal justice involvement that prevent some women from gaining or retaining access to the program. HACLA has partnered with community-based organizations to administer the Section 8 Pilot Reentry program that allows families on the Section 8 Voucher Program to reunite with formerly incarcerated family members on release.²⁵ However, this program has yet to reach its full potential. Many families do not fulfill their participation requirements for the Section 8 Pilot Reentry Program because they are either unwilling to reunite with their formerly incarcerated family members or unable to complete the full year requirement of supportive services.

Another major barrier reentering women face in accessing housing is the unwillingness of landlords, housing providers, and community residents to allow formerly incarcerated persons to return to their communities. Although California law has created the obligation to promote nondiscrimination in the

25 Hous. AUTH. OF THE CITY OF L.A., Section 8 Administrative Plan 13-1 (2015), <http://www.hacla.org/Portals/0/Attachments/Public%20Documents/S8%20AP%202016%20October%202015.pdf>, at 3-15.

provision of housing,²⁶ the current iteration of the law does not adequately address the discrimination that reentering individuals face when looking for housing.

Transitional housing programs have strict rules that are often arbitrarily enforced and that put women at constant risk of being removed from housing. Ideally, transitional housing for reentering women would take an approach more in line with the City of Los Angeles’s “housing first” approach to homelessness, which removes barriers to housing access such as onerous zero tolerance rules against substance abuse.²⁷ Such an approach recognizes that stable housing is a prerequisite to addressing deeper systemic issues, such as homelessness and the cycles of trauma experienced by criminal justice-involved women.

There is insufficient support for women families and their communities as they reenter Los Angeles. A culturally adequate reentry policy would start while the reentering family member is still incarcerated, to allow for the “receiving” family to adequately prepare for their incarcerated family member’s return and alleviate some of the tensions that arise immediately upon family reunification.

Employment

Accessing stable employment is a concern for reentering women far prior to the end of their incarceration. A woman’s ability to access and succeed in employment is affected by her educational level and experiences of trauma. Challenges experienced by the CIW Think Tank members included:

- lack of access to education, employment training, and information while incarcerated; and
- inability to secure employment after release.

Low job readiness and low job retention among returning women are prevalent and indicate an inadequate system of employment resources. Both raise serious concerns, given the significant connection between employment and recidivism.²⁸ The criminal justice system provides insufficient resources to individuals both during incarceration and upon reentry. In order to reduce recidivism, institutional programs that help prepare individuals to meet their basic needs upon reentry are essential. Thus, educational programs should help build not only technical skills, but also soft skills that will allow previously incarcerated women to reintegrate into society successfully.

26 The Department of Fair Employment and Housing (DFEH) instructs that it is unlawful “[f]or the owner of any housing accommodation to discriminate against or harass any person because of the race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, or genetic information of that person. Cal. Gov’t Code § 12955(a).

27 *Housing First*, Off. of L.A. Mayor Eric Garcetti <https://www.lamayor.org/housing-first> (last visited May 6, 2018).

28 See Nally et al., *supra* note 15.

Upon release, job opportunities are more limited for returning women than for returning men.

Although efforts are underway to shift the prejudices and misplaced concerns that many employers have against criminal justice-involved applicants, employment resources and opportunities necessary for successful reentry remain unavailable and inaccessible.

Despite amendments to California's open access laws,²⁹ change has been slow and a large portion of courses offered in prisons remain distance courses. Correspondence courses and in-person programs present further obstacles as women at CIW do not have computer access, so incarcerated women applying for enrollment in programs must do so by hand. This drastically slows down the application process, causing many students to self-withdraw. Correspondence courses at CIW also pose a challenge for women who enter prison with low levels of literacy or whose trauma or other conditions make self-study especially difficult.

Upon release, job opportunities are more limited for returning women than for returning men. A large portion of the California Prison Industry Authority (CALPIA) work programs remains contracted work by private companies who, on the outside, are resistant to hiring formerly incarcerated women.³⁰ Women who attain certification from career technical education courses also have no guaranteed employment upon graduation and parole. Moreover, most available jobs for formerly incarcerated individuals are hard labor jobs in fields dominated by men—such as construction and manufacturing—that tend to be less concerned about prior incarceration.³¹ Many returning women are not capable of accepting these jobs due to physical and social barriers.

About eighty percent of Los Angeles employers refuse to hire applicants with prior convictions.³² Unlawful inquiry about prior convictions on job applications is one of the main employment obstacles formerly incarcerated individuals face nationally. California has banned state and local governments from asking for conviction information until an offer of employment has been made, and this restriction has been extended to the private sector.³³ Although efforts are underway to shift the prejudices and misplaced concerns that many employers have against criminal justice-involved applicants, employment resources and opportunities necessary for successful reentry remain unavailable and inaccessible.

In sum, there is a lot of work to be done by Los Angeles public authorities to ensure the human rights to housing and work for women reentering Los Angeles communities.

29 S.B. 1391, Chapter 695 (Cal. 2014), http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201320140SB1391#. In-person courses in prisons and jails violated open access laws prior to the amendment as courses inside institutions would not be open to the general student population. The passing of SB 1391 in California allowed community colleges in-person access to and offered full funding for courses in prisons. STANFORD LAW SCH. & BERKELEY LAW, DEGREES OF FREEDOM: EXPANDING COLLEGE OPPORTUNITIES FOR CURRENTLY AND FORMERLY INCARCERATED CALIFORNIANS 11 (2015), https://www.law.berkeley.edu/files/DegreesofFreedom2015_FullReport.pdf.

30 See CAL. PRISON INDUSTRY AUTHORITY, REPORT TO THE LEGISLATURE FISCAL YEAR 2008–2009 11 (2009).

31 Barbara E. Bloom, MEETING THE NEEDS OF WOMEN IN CALIFORNIA'S COUNTY JUSTICE SYSTEMS 11 (2015).

32 Michael A. Stoll & Shawn D. Bushway, *The Effect of Criminal Background Checks on Hiring Ex-Offenders*, 7 CRIMINOLOGY & PUB. POL'Y 3 371, 383 (2008).

33 Cal. Gov't Code § 12952.

RECOMMENDATIONS

General Recommendations

The general recommendations that follow are a synthesis of insights and vision from the CIW Think Tank, as well as the various community partners and stakeholders who were consulted in the production of the Report. They provide important guidance to local authorities for achieving a human rights-compliant housing and employment reentry policy for women in accordance with CEDAW.

General Recommendations on Reentering Women’s Right to Housing

- **Develop a Strategic Plan:** Los Angeles local authorities must develop a housing strategy which “defines the objectives for the development of shelter conditions, identifies the resources available to meet these goals and the most cost-effective way of using them and sets out the responsibilities and time frame for the implementation of the necessary measures[.]”³⁴
- **Pursue Meaningful Consultation and Participation:** Los Angeles local authorities must promote participation of and consultation with affected groups in the development of strategies of implementation of the right to housing. Meeting this obligation will require creating accessible and effective mechanisms through which currently and formerly incarcerated women can engage in meaningful dialogue with policy-makers.
- **Adopt a Gender-Responsive Approach:** Los Angeles local authorities must refrain from gender discrimination in the creation of housing policy and its implementation. This necessitates using a “gender-responsive approach” that takes gender into account to address differences in the experiences of formerly incarcerated men and women.
- **Pursue Inter-local Governmental Coordination:** Los Angeles local authorities must coordinate with other spheres of local government, such as the County of Los Angeles, municipalities within LA County, and other neighboring jurisdictions, to harmonize their work with the housing strategy.

General Recommendations on Reentering Women’s Right to Employment

- **Ensure Equal Access to Employment:** Los Angeles local authorities must “refrain from denying or limiting equal access to decent work for all persons, especially women disadvantaged and marginalized individuals and groups, including prisoners or detainees[.]”³⁵ Both incarcerated and formerly incarcerated women require equal access to decent work. Los Angeles local

34 U.N. Comm. on Econ., Soc., & Cultural Rights, General Comment 4 on the Right to Adequate Housing (Art. 11 (1) of the Covenant), para. 12, U.N. Doc. E/1992/23 annex III at 91 (Dec. 13, 1991).

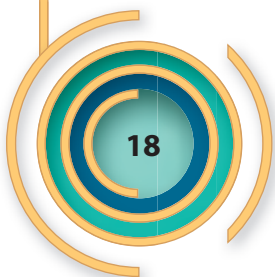
35 U.N. Comm. On Econ., Soc., & Cultural Rights, General Comment 18 on the Right to Work, para. 42, U.N. Doc. E/C.12/GC/18 (Nov. 24, 2005).

authorities must take effective measures to promote equal job access, training, and opportunities for reentering women, including developing and adopting necessary legislation.

- **Pursue Meaningful Consultation, Participation and Partnership:** Los Angeles local authorities must consult and partner with women facing reentry to assess their needs and collaboratively formulate and implement future policy to ensure equality and employment opportunities.
- **Develop a Strategic Plan:** Los Angeles local authorities must develop a plan to ensure reentering women have effective access to information concerning their rights and available resources with respect to employment. Los Angeles local authorities must form a plan to fulfill the right to work for reentering women who face barriers. The formation of this plan should involve the participation of reentering women and outline how Los Angeles will overcome unemployment.
- **Ensure Accountability for and Elimination of Employment Discrimination:** Los Angeles local authorities must protect reentering women from employment discrimination by holding violators accountable and developing a plan to eliminate practices and biases that disadvantage them. Develop Educational Programs: Los Angeles local authorities must develop educational programs for reentering women, to increase their access to employment opportunities

Specific Recommendations

The following tables set forth specific recommendations for Los Angeles local authorities that are drawn from the extensive consultations on the experiences of women navigating the process of re-entry in Los Angeles. The recommendations are organized around the characteristics of housing and employment identified as particularly relevant by the Think Tank and speak directly to the analysis in the body of the report.



Specific Reentry Housing Policy Recommendations for Los Angeles Local Authorities

Human Rights Requirement	Recommendation
Security of Tenure	<ul style="list-style-type: none"> ■ Utilize a “housing first” approach in transitional housing by implementing clear, trauma-informed, and uniformly enforced policies and rules. Refrain from non-holistic and zero-tolerance policies that lead to housing insecurity. ■ Address tensions within families regarding an incarcerated family member’s return by engaging in better outreach with families already on the Section 8 Program. Provide a forum for families to articulate the concerns, fears, or hopes that may stifle or encourage their participation in HACLA’s Pilot Reentry Program. ■ Make trauma services readily available for families in federal housing programs that are unwilling to reunite with a reentering formerly incarcerated family member so that they can work through past harms and trauma cycles. ■ Amend HACOLA’s admission rules for its public housing program to ensure that individuals on probation or parole are not automatically precluded from applying and participating in its public housing program.
Affordability	<ul style="list-style-type: none"> ■ Address the intersection of child custody laws and housing affordability for reentering mothers hoping to reunite their families. ■ Build affordable housing with a focus on formerly incarcerated women. ■ Strengthen coalitions amongst key private stakeholders, such as the Apartment Owners Association and the Minority Apartment Owners Association, in order to help them advocate for affordable housing and combat private development advocates such as the California Legislative Analyst’s Office. Research and further articulate pragmatic cost-savings arguments and data on the long-term effects of affordable housing on displacement reduction. ■ Provide additional incentives, such as tax breaks, to private landlords and developers.
Location	<ul style="list-style-type: none"> ■ Allow for more flexibility for reentering women to choose their parole location by making the process of requesting a change clear and accessible, and by providing timely responses to requests. ■ Research the connection between parole placement, communities’ cultures, and recidivism.
Accessibility	<ul style="list-style-type: none"> ■ Ensure that transitional housing and public housing authorities provide trauma-informed services. ■ Pass antidiscrimination legislation to address housing discrimination against the formerly incarcerated. ■ Forge working partnerships between local public housing authorities, such as HACLA and HACOLA, and the City of Los Angeles to bring about greater distribution of the information in HUD’s Guidance Note to begin to erode criminal history-related barriers to housing resources within the greater Los Angeles area. This distribution could take many forms, including public education seminars, know-your-rights-pamphlets, and workshops for developers. Additionally, in order to address the obvious limitations of the Guidance Note’s legal enforceability and to overcome oppositionists’ concerns, the city of Los Angeles must introduce legislation providing legal protections against discriminatory policies affecting reentering formerly incarcerated persons. ■ Assess the local viability of legislation such as San Francisco’s 2014 Fair Chance Ordinance, which addresses the discriminatory effect that housing policies have on persons with arrest and conviction records.³⁶ ■ Engage in broader outreach to key landlord stakeholders to build the trust and understanding necessary to de-stigmatize individuals with criminal records. Direct resources towards organizing town halls and facilitating transparent meetings of stakeholders, especially formerly incarcerated women. Educate landlords’ associations about the population of formerly incarcerated women to address barriers to access in the private housing market. ■ Create or expand facilities to accommodate children impacted by their mothers’ incarceration. For some reentering women, this simply means allowing them housing space to care for their child. For others who seek to participate in wider reentry programming such as job training, trauma care, health care, or education, it means providing childcare and education services, thereby allowing reentering women to focus on their own successful reentry. Many reentering women prioritize their children’s needs before their own; facilities should thus work to alleviate the perception among many women that the reentry process is discriminatory against mothers. ■ Dismantle further barriers that reentering women face in the search for housing, such as the disqualification of prospective tenants based on mental health concerns. Pressure housing providers to provide more spaces to reentering women without additional qualifying or disqualifying admission factors.

36 See Hum. Rts. Commission, *Fair Chance Ordinance*, <http://sf-hrc.org/fair-chance-ordinance> (last visited May 5, 2018).

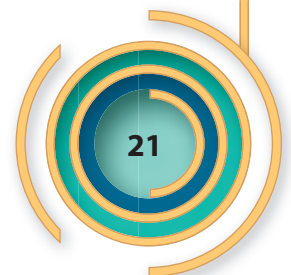
Executive Summary

Education	<ul style="list-style-type: none"> ■ Begin education and reentry for secure affordable housing early in the period of incarceration.
Access to Information	<ul style="list-style-type: none"> ■ Disseminate clear and accessible information about HACLA's Section 8 Pilot Reentry Program more widely to currently and formerly incarcerated women.
Cultural Adequacy	<ul style="list-style-type: none"> ■ Begin family reunification services during incarceration, including family and child counseling, easily accessible family visits, and family education. ■ Create peer "family-to-family" mentorship programs that connect families that have successfully reunited with families who are anticipating reunification. Encourage community organizations and service providers to start programming that supports families while the eventually reentering family member is still incarcerated. ■ Support community efforts to create networks and coalitions of formerly incarcerated people that mentor and encourage one another. Remove parole restrictions that undermine the capacity of formerly incarcerated women to support each other. ■ Work with CDCR and former participants in CCTRP and FOTEP to expand transitional housing programs and their admission criteria. Collect data on successful reentry by former CCTRP and FOTEP participants in order to advocate for the following changes: (1) clearance of CDCR's backlog of applications to these programs; and (2) allowing more people to participate in transitional housing programs by removing factors such as preclusions based on the convicted offense that led to the incarceration. Compile this data and plan strategic initiatives to meet these goals in partnership with former CCTRP and FOTEP participants.
Participation	<ul style="list-style-type: none"> ■ Create a mechanism by which currently and formerly incarcerated women can communicate with local government authorities about their needs and their perspectives on the implementation of policies that affect their lives.

Specific Reentry Employment Policy Recommendations for Los Angeles Local Authorities

Human Rights Requirement	Recommendation
Availability	<ul style="list-style-type: none"> ■ Assign case managers to reentering women during incarceration and upon release to assist with finding and securing employment. ■ Implement peer-to-peer programs, mentoring programs, and other systems of support for job readiness, career and vocational planning, settling into a new job, staying in the job, and dealing with job-related stressors. Services provided should include resume building, cover letter writing, and mock interviewing. ■ Implement more in-person education/skill-building programs and tie success within these programs to incentives such as reduced sentences. Ensure that credits from education programs transfer to four-year universities. Provide funding for incarcerated individuals to access educational opportunities, including degree programs. ■ Establish training programs and create job opportunities in sectors other than hard labor. ■ Expand programs such as community development financial institutions, which provide financial loans to under-served and low-income communities, particularly to fund educational endeavors. ■ Expand programs such as Project Rebound, which provides services such as assistance with school applications, mentorship, tutoring, and personal support with finances and psychological wellbeing. ■ Reform parole programs that prevent formerly incarcerated people from associating with each other in order to promote beneficial mentoring relationships. ■ Allow colleges to work with students on parole after they are released. ■ Connect reentering women with employers prior to their release from incarceration. Connect students with jobs upon graduation or parole through career technical education courses. ■ Host employment resource fairs within and outside of carceral facilities. ■ Increase the availability of in-person arts programs that develop soft skills. Ensure that access to these programs is available and permissible upon parole. ■ Establish more community-based employment reentry programs. ■ Ensure all services are trauma-informed and focused on rehabilitation. Provide trauma-centered care beginning when individuals are incarcerated, and ensure all services before and during incarceration are trauma informed. ■ Create a task force to develop a centralized online employment resource database and improve dissemination of reentry services information. ■ Increase computer access during incarceration, particularly for education and employment-related applications.

Human Rights Requirement	Recommendation
<p>Accessibility</p>	<ul style="list-style-type: none"> ■ Start education and public outreach programs to eliminate prejudice against women facing reentry. ■ Establish educational programs for employers and employment agencies in particular to increase their acceptance of hiring formerly incarcerated people. ■ Reduce bureaucratic obstacles and/or increase financial incentives, such as tax credits, for employers to hire formerly incarcerated individuals. ■ Prohibit employers from requiring disclosure of past criminal justice involvement where this information is irrelevant for the positions that reentering women seek. ■ Tailor background checks to specific jobs, and only require these checks where they are necessary. ■ Eliminate discretionary decision-making in the expungement process and establish criteria to standardize the process and to make it fair. Establish more expungement clinics. ■ Provide public transportation subsidies for reentering women and/or create ride-share/van programs to assist with employment transportation needs. ■ Remove restrictions on parole locales and permit women to return to the communities where they believe they can rebuild their lives. ■ Disassociate education level from eligibility for work programs.
<p>Acceptability & Quality</p>	<ul style="list-style-type: none"> ■ Improve access to social services for reentering women and eliminate disqualifying factors related to incarceration. ■ Create a complaints and enforcement mechanism to hold employers accountable for employment violations targeting reentering women. ■ Enact legislation to guarantee equal remuneration for reentering women.



METHODOLOGY

A HUMAN RIGHTS APPROACH: DIRECT PARTICIPATION, INTERSECTIONALITY, AND INDIVISIBILITY OF RIGHTS

Women currently incarcerated at CIW led the production and development of this Report. The Report thus puts into practice one of its central claims: participation by directly impacted populations is key to actualizing human rights.³⁷ The CIW Think Tank led the process of giving voice to the concerns of incarcerated women anticipating reentry in Los Angeles. Members of the Think Tank consulted with other women incarcerated at CIW to produce the insights that are communicated in this Report. This work was completed through the UCLA Prison Education Program at CIW, which seeks in part to equip women for reentry. Under the CIW Think Tank's direction, students in the IHRC drafted this Report with the supervision of Professor E. Tendayi Achiume and the vital assistance of Professor Bryonn Bain, who at the time was developing UCLA's prison education program.

In producing this Report, the CIW Think Tank and the IHRC pursued an intersectional approach to evaluating the needs and concerns of incarcerated women reentering Los Angeles. The people who bear the brunt of systemic oppression, including reentering women, suffer subordination that is rooted in multiple, overlapping structures.³⁸ Under these circumstances, “[w]here systems of race, gender, and class domination converge,” advocacy that fails to address oppression holistically falls short of addressing the needs of oppressed people. This Report therefore begins from the premise that reentering women face intersectional challenges produced by multiple structures of oppression. The struggles that currently and formerly incarcerated women face are not single-issue struggles.³⁹ As such, the Report does not perform a single-issue analysis or propose single-issue solutions.

Reentering women face intersectional struggles that pervade every aspect of their lives; among those, the women of the Think Tank identify housing and employment as their most urgent needs. Although this Report focuses on the rights to housing and employment, an underlying principle of its analysis is the indivisibility of human rights. As Pete White of the Los Angeles Community Action Network explains:

“[I]n human rights . . . we know that all the rights are inextricable. [W]e know for example, that if you talk about the human right to housing, you don't have the human right

37 See *infra* Section II for a discussion on participation as a tenet of human rights law.

38 Kimberlé W. Crenshaw, *Mapping the Margins: Intersectionality, Identity Politics, and Violence Against Women of Color*, 43 *STAN. L. REV.* 1241, 1251 (1991).

39 “There is no such thing as a single-issue struggle, because we do not live single-issue lives.” AUDRE LORDE, *Learnings from the 60s*, in *SISTER OUTSIDER: ESSAYS & SPEECHES* 134, 138 (rev. ed. 2007).

to housing unless your human right to work is fulfilled, your human right to transportation, to access, to schools [and so on]. . . . [An indivisibility approach] ground[s] us in our vision and our imagination of the world that we want to live in[.]⁴⁰

Because of the fundamentally indivisible nature of human rights, the Report's focus on the rights to housing and employment serves not to exclude other rights, but to further them.

OVERVIEW OF THE COLLABORATIVE PRODUCTION PROCESS

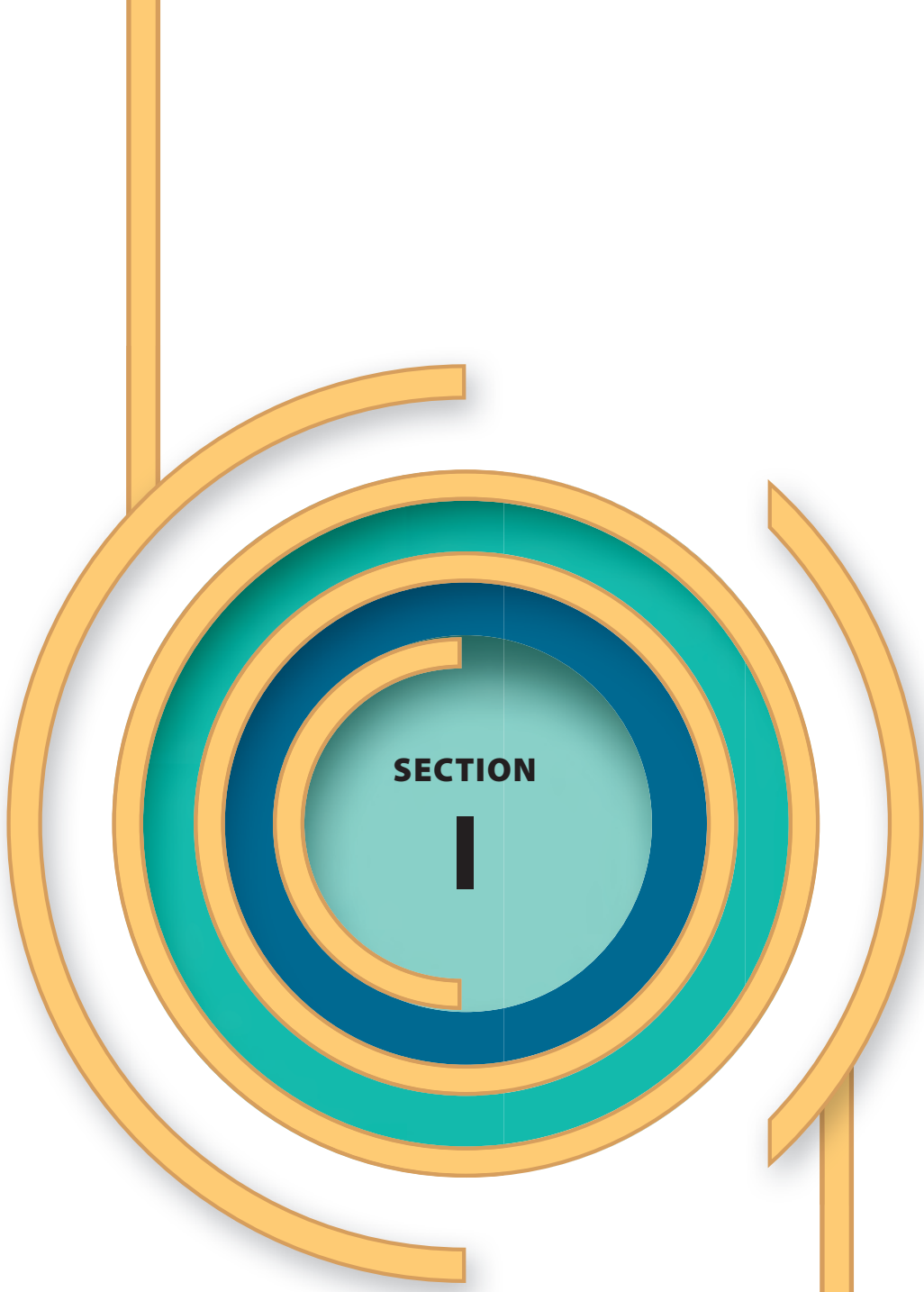
During the fall 2016 semester, the IHRC traveled twice a month to CIW to meet with the Think Tank to develop this Report. Through consultations with each other and with other women incarcerated at CIW, members of the CIW Think Tank articulated their understanding of the most pressing needs that women face upon reentering Los Angeles, focusing on the areas of housing and employment. In turn, the IHRC team conducted interviews with community partners and other stakeholders, as well as secondary research on Los Angeles's reentry landscape and the applicable international human rights standards. The Report was written during this period based on these consultations, and it was ultimately finalized in 2018.

Together, the CIW Think Tank and the IHRC applied their respective expertise to the issues at the center of this Report to identify the steps that the Mayor's Office of Reentry and other public actors in Los Angeles must take to fulfill the human rights to housing and employment of reentering women.⁴¹

40 Interview with Pete White, Exec. Dir. & Founder, L.A. Cmty. Action Network, in L.A., Cal. (Nov. 18, 2016).

41 See *infra* Section II for the international human rights standards employed in the Report. See *infra* Section III for the application of these standards to the current reentry landscape in Los Angeles.





SECTION

I

REENTRY
THE LANDSCAPE,
THE LIVES, THE LAWS

SECTION I

REENTRY: THE LANDSCAPE, THE LIVES, THE LAWS

The human rights framework not only provides reentering women with the means and vocabulary to articulate their dreams for a just and equitable city: it also produces suggestions and policy recommendations for government actors.⁴²

A. THE LANDSCAPE: REENTRY, HOUSING, AND EMPLOYMENT

Reentry

The Federal Interagency Reentry Council defines reentry as “the transition from incarceration—life in prison, jail, or juvenile justice facilities—to life in the community.”⁴³

Reentry, however, is not simply a transition from point A to point B: it is a complex social process characterized by pervasive barriers. People reentering their communities face significant obstacles at the door of nearly every social institution, from employment and housing to education and social services. Reentry occurs in the context of historically rooted structures of racial inequality that today disproportionately subject communities of color to over-policing and mass incarceration.⁴⁴ The United States constitutes less than five percent of the world’s population, but it is home to more than twenty percent of the world’s incarcerated population: one in three adults in the U.S. has a criminal record.⁴⁵ The United States incarcerates over five times the number of people that it did in 1970;⁴⁶ every year, 600,000 people transition out of federal and state prisons, while 11.4 million people cycle through local jails.⁴⁷ Black and Hispanic

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42 COLUM. L. SCH., HUMAN RIGHTS INST., BRINGING HUMAN RIGHTS HOME: HOW STATE AND LOCAL GOVERNMENTS CAN USE HUMAN RIGHTS TO ADVANCE LOCAL POLICY 2 (2012).

43 FED. INTERAGENCY REENTRY COUNCIL, THE FEDERAL INTERAGENCY REENTRY COUNCIL: A RECORD OF PROGRESS AND A ROADMAP FOR THE FUTURE 3 (2016).

44 “It is fair to say that we have witnessed an evolution in the United States from a racial caste system based entirely on exploitation (slavery), to one based largely on subordination (Jim Crow), to one defined by marginalization (mass incarceration).” MICHELLE ALEXANDER, THE NEW JIM CROW: MASS INCARCERATION IN THE AGE OF COLORBLINDNESS 219 (2010).

45 FED. INTERAGENCY REENTRY COUNCIL, *supra* note 43, at 3.

46 *Id.* at 8.

47 *Id.* at 3.

communities respectively comprise approximately thirteen percent and seventeen percent of the population of the United States;⁴⁸ however, Black people disproportionately make up 37.9 percent of the prison population⁴⁹ and Hispanic people make up 33.4% of the prison population.⁵⁰ In Los Angeles specifically, of the 42,750 people in prison, over 90 percent are non-white people.⁵¹

“Having spent so much time in prison, I see recidivism as a systemic problem.”⁵²

CIW Think Tank Member

Approximately ninety-five percent of people incarcerated in state or federal prisons will eventually return home,⁵³ and the current system will fail most of them. Nationally, two of every three people released from a state prison are rearrested for a new offense within three years.⁵⁴ Recidivism is a structural feature of reentry policies that do little to rectify the inequalities that built our criminal injustice system.⁵⁵

Housing

For incarcerated women at CIW and for others preparing to reenter, adequate housing is an essential component of reintegration into their communities and a key factor in establishing independence.⁵⁶

Los Angeles has the most unaffordable housing market in the nation, surpassing even New York and San Francisco.⁵⁷ As of 2013, Los Angeles residents experience the highest

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- 48 *QuickFacts: United States*, U.S. CENSUS BUREAU, <https://www.census.gov/quickfacts/table/PST045216/00> (last visited May 6, 2018).
 - 49 *Inmate Statistics: Inmate Race*, FED. BUREAU OF PRISONS, https://www.bop.gov/about/statistics/statistics_inmate_race.jsp (last updated Dec. 24, 2016).
 - 50 *Inmate Statistics: Inmate Ethnicity*, FED. BUREAU OF PRISONS, https://www.bop.gov/about/statistics/statistics_inmate_ethnicity.jsp (last updated Dec. 24, 2016).
 - 51 *Los Angeles County*, CAL. SENTENCING INST., <http://casi.cjci.org/data/2016-adult.xlsx> (last visited Sept. 27, 2018).
 - 52 Interview by Linda of Leslie, Member, CIW Think Tank, in Chino, Cal. (Nov. 30, 2016).
 - 53 FED. INTERAGENCY REENTRY COUNCIL, *supra* note 43, at 3.
 - 54 *Id.*
 - 55 Taylor L. Hall et al., *Postincarceration Policies and Prisoner Reentry: Implications for Policies and Programs Aimed at Reducing Recidivism and Poverty*, 20 J. POVERTY 56, 63 (2016) (discussing the consequences of post-incarceration policies).
 - 56 See Meme’s Story (discussing the role that housing plays in preventing recidivism). See also Letter from Meme *infra* Appendix A (describing a friend’s reentry, in which homelessness drove her to reoffend to survive).
 - 57 ROSALIE RAY ET AL., UCLA LUSKIN SCH. OF PUB. AFFAIRS, *IMPACTS OF THE WIDENING DIVIDE: LOS ANGELES AT THE FOREFRONT OF THE RENT BURDEN CRISIS 1* (rev. 2014), <http://www.anderson.ucla.edu/Documents/areas/ctr/ziman/2014-08WPrev.pdf>.

median rent burden⁵⁸ in the nation: the majority of Los Angeles renters spend at least forty-seven percent of their income on rent alone.⁵⁹ Moreover, over thirty-five percent of Los Angeles city households, or 458,220 households, are extremely low to low-income households.⁶⁰ Only forty percent of Los Angeles city households live in units that they own; and Los Angeles city residents must make a staggering income of over \$112,260 to afford the median price home.⁶¹ In this dismal reality, formerly incarcerated women upon their release return to a city that is unaffordable and inaccessible.

The link between incarceration and homelessness further underscores the importance of housing for reentry success. Nearly a tenth of the population entering prisons were recently homeless; and the same proportion of people exiting prisons will end up temporarily homeless.⁶² In California, ten percent of parolees statewide were homeless in 1997, while the homelessness rate for parolees in Los Angeles was as high as thirty to fifty percent for the same year.⁶³ The risk of homelessness is even greater for people with a history of mental illness or drug abuse: thirty percent of the United States' chronically homeless population and twenty percent of United States' incarcerated population have a serious mental illness.⁶⁴ These statistics are especially salient in Los Angeles, a city that has increasingly been charged with criminalizing homelessness.⁶⁵ Laws that criminalize homelessness sustain mass incarceration by perpetuating post-release barriers to housing and increasing the likelihood of recidivism.

In addition to the resources and programs it already offers, Los Angeles must make significant investments in implementing holistic housing policies. For example, to work toward realizing the right to housing, Los Angeles must make affordable units available to meet the initial threshold of immediate state obligations outlined in Section II.

Los Angeles has increasingly been charged with criminalizing homelessness.

58 One factor in assessing housing affordability, “[r]ent burden is the ratio of rent to income and is generally expressed as the percentage of income devoted to rent.” *Id.* at 7.

59 *Id.* at 8.

60 *Fact Sheet*, HOUS. AUTH. OF THE CITY OF L.A., http://www.hacla.org/Portals/0/Attachments/Fact%20Sheets/HACLA%20Fact%20Sheet_2015%2007.20.16%20FINAL.pdf (last updated July 20, 2016).

61 *Id.*

62 CATERINA GOUVIS ROMAN & JEREMY TRAVIS, URBAN INSTITUTE, *TAKING STOCK: HOUSING, HOMELESSNESS, AND PRISONER REENTRY* 8 (2004), <http://www.urban.org/sites/default/files/publication/58121/411096-Taking-Stock.PDF>.

63 *Id.* at 7.

64 *Consequences of Non-Treatment*, TREATMENT ADVOCACY CTR., <http://www.treatmentadvocacycenter.org/key-issues/consequences-of-non-treatment> (last visited May 6, 2018).

65 See Alice Wang, *The Continuing Criminalization of Homelessness in Los Angeles*, HARV. CIV. RTS.–CIV. LIBERTIES L. REV. (Mar. 29, 2016), <http://harvardcrcl.org/the-continuing-criminalization-of-homelessness-in-los-angeles/>.



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Employment

The “box” on job applications is one of the main employment roadblocks that formerly incarcerated individuals face nationally.⁶⁶ In Los Angeles, about eighty percent of employers refuse to hire applicants with prior convictions.⁶⁷ In light of the recent victories of Proposition 47 in 2014⁶⁸ and Proposition 57 in 2016, the approach that employers take is particularly salient for the reintegration of parolees. California has banned state and local governments from asking for conviction information until an offer of employment has been made,⁶⁹ and Los Angeles’s lawmakers have passed legislation extending this restriction to the private sector.⁷⁰ Despite these efforts to shift the prejudices and misplaced concerns that many employers have about criminal justice-involved applicants, the employment resources and opportunities necessary for successful reentry remain unavailable and inaccessible.

Low rates of job readiness and of job retention are prevalent among returning women,⁷¹ demonstrating the inadequacy of employment resources currently available. Both of these raise serious concerns given the significant connection between employment and recidivism.⁷² Although the United States justifies incarceration as rehabilitative and expects individuals coming out of the system to fully participate in society upon reentry, it has largely failed to prepare criminal justice-involved individuals for the workforce.⁷³ The criminal justice system does not provide sufficient resources to individuals during incarceration or upon reentry.⁷⁴ Los Angeles must act to realize the right to work for reentering women.

66 The “box” refers to the question on job applications inquiring into conviction records.

67 Michael A. Stoll & Shawn D. Bushway, *The Effect of Criminal Background Checks on Hiring Ex-Offenders*, 7 CRIMINOLOGY & PUB. POL’Y 3 371, 383 (September 2008).

68 See *What You Need to Know About Proposition 47*, CAL. DEP’T OF CORR. & REHAB., <http://www.cdcr.ca.gov/news/prop47.html> (last visited Dec. 16, 2016). Los Angeles County received twenty million dollars in grants from Prop 47 savings to distribute to community-based organizations that provide services to paroled individuals, such as employment training. *Board Awards \$103m in Prop 47 Funds to Innovative Rehabilitative Programs*, BD. OF STATE AND CMTY. CORR. (June 8, 2017) <http://www.bscc.ca.gov/news.php?id=125>.

69 Alice Walton, *L.A. Wants to Delay When Employers May Ask About Criminal Histories*, L.A. TIMES (Sept. 27, 2016), <http://www.latimes.com/local/lanow/la-me-ln-ban-the-box-20160927-snap-story.html>.

70 LOS ANGELES, CAL., MUNICIPAL CODE ch. 18, art. 9 (2016) (specifying that only businesses with 10 or more employees and city contractors and subcontractors will be affected).

71 See *infra* Section III.

72 See Nally, et al., *Post-Release Recidivism and Employment Among Different Types of Released Offenders: A 5-Year Follow-up Study in the United States*, 9 INTERNATIONAL JOURNAL OF CRIMINAL JUSTICE SCIENCES 16 (2014).

73 See Carla Rivera, *Four Prisons in California to Get Community College Programs*, L.A. TIMES (Aug. 5, 2015), <http://www.latimes.com/local/education/la-me-pell-inmate-column-20150805-story.html> (“More than 700,000 [individuals] are released each year, a significant but marginalized population frequently unprepared for life on the outside, with few skills and often without a high school diploma. College-level instruction on the inside is mostly a patchwork of correspondence courses and privately-funded in-house programs staffed by volunteers.”).

74 Interview with Tiffany Johnson, Assoc. Dir. & Cmty. Organizer, A New Way of Life, in L.A., Cal. (Oct. 27, 2016) (“Where are the resources? Where’s the support? Where’s the helping hand? Where’s the guidance? People expect for people to change, assuming they know what that change is and how to get there. Everybody wants to change, wants to better themselves, but do we always know how to get there? No.”).

B. THE LIVES: WOMEN AND REENTRY

“It is clear that the incarceration of women is not rehabilitative, but instead thwarts recovery. . . . Societal pressures are in a large part responsible for the incarceration of women. . . . During incarceration, women are not healed, but instead are subjected to further trauma. The current conditions of incarceration are contrary to reformation and growth, and instead encourage continued drug use and criminality. Given this information, major changes are needed.”⁷⁵

Paige Linville, CIW Think Tank Member

Although *all* of reentry policy needs reform,⁷⁶ this Report focuses on the needs of reentering women. This is because “[t]he circumstances of criminal justice involved women are radically different from those of men. Women are arrested and incarcerated for different crimes, and have different needs.”⁷⁷ Over the past several decades, the rate of increase in the incarceration of women has been double that of men.⁷⁸ In California, nearly 10,000 women are released from carceral facilities operated by the state each year.⁷⁹ Over twenty-two percent of women released in California recidivate within one year⁸⁰—a clear sign that the systems currently in place do not prepare women for release. The facts surrounding recidivism must be understood in the context of overlapping intersectional systems of oppression, including race and class, affecting women in LA. In Los Angeles, over seventy percent of women are women of color,⁸¹ and a quarter of the women in the city do not even have a high school degree.⁸²

In California, nearly 10,000 women are released from carceral facilities operated by the state each year. Over twenty-two percent of women released in California recidivate within one year.

75 Paige Linville, CIW Think Tank, *Criminalization of Trauma*, at 5 (June 3, 2016) (on file with authors) (highlighting the extent to which criminal justice-involved women deal with trauma before, during, and after a sentence).

76 Laws and policies that continue to criminalize and sanction formerly incarcerated people ensure that “[t]he vast majority of convicted offenders will never integrate into mainstream, white society. They will be discriminated against, legally, for the rest of their lives—denied employment, housing, education, and public benefits. Unable to surmount these obstacles, most will eventually return to prison and then be released again, caught in a closed circuit of perpetual marginality.” ALEXANDER, *supra* note 44, at 186.

77 Linville, *supra* note 75 at 3.
“While the War on Drugs is responsible for mass incarceration of Black males, it also results in the imprisonment of countless females, especially women of color. According to Amnesty International, ‘Black women are imprisoned at a rate eight times that of white women; Hispanic women are imprisoned at a rate four times that of white women’ Women account for a small percentage of the overall prison population, but their rate of incarceration is rising drastically. In fact, ‘[S]ince 1980, the number of women imprisoned in the United States has increased at a rate nearly double the rate for men’ The majority of the women are incarcerated for drug offenses which, according to a study conducted by the Bureau of Justice Statistics, ‘represent the largest share of growth in the number of female offenders (38%, compared with 17% for males)’” (internal citations omitted).

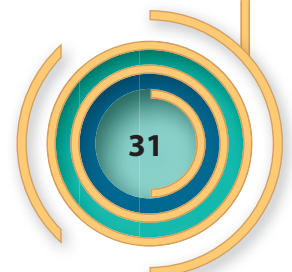
78 FED. INTERAGENCY REENTRY COUNCIL, *supra* note 43, at 6.

79 CAL. DEP’T CORR., OFFICE OF RESEARCH, OUTCOME EVALUATION REPORT (2016) at 6.

80 *Id.* at 16.

81 CITY OF L.A., OFFICE OF THE MAYOR, REPORT ON THE STATUS OF WOMEN AND GIRLS IN THE CITY OF LOS ANGELES: PART 4 EDUCATION AND WORKFORCE DEVELOPMENT (2015) at 8.

82 *Id.* at 8.



There are other vulnerable populations whose experiences are not captured in this Report.

The CIW Think Tank identified housing and employment as urgent priorities that should serve as the focal points of this Report.⁸³ Members of the CIW Think Tank surveyed fifty incarcerated women—all of whom will be paroling soon—and found that an overwhelming 76 percent considered housing to be a top concern for parole. Employment came second among their concerns, at 36 percent.⁸⁴ However, as CIW Think Tank consultations have made clear, incarcerated women have diverse perspectives on and expectations of what housing and employment can and should mean. These perspectives and expectations are shaped by economic disenfranchisement, racialized policing, and discriminatory educational opportunities.⁸⁵

Notably, there are other vulnerable populations whose experiences are not captured in this Report. It does not discuss, for example, the acute and specific challenges faced by transgender women in prison or by gender non-conforming people coming out of jail.⁸⁶ Nor does it specifically address the needs of young people who are increasingly criminalized and incarcerated in juvenile detention centers throughout Southern California.⁸⁷ The complex effects of reentry upon a variety of populations requires working in broad partnerships with organizations that respond directly to communities impacted by incarceration.

C. THE LAWS: LOCAL IMPLEMENTATION OF HUMAN RIGHTS

“Human rights should matter everywhere because we are all connected. For a community to survive, there must be a decent level of human rights so that it does not disintegrate into a predator/victim model. In my experience of incarceration, it is amazing what a demonstration of human dignity can have and the impact it can have on a broken individual.”⁸⁸

CIW Think Tank Member

83 The Think Tank arrived at this conclusion through a series of internal discussions and discussions with other incarcerated women.

84 LINDA WOO, SURVEY OF REENTRY PRIORITIES: DATA ANALYSIS (2016).

85 See Interview of Leslie by Linda, *supra* note 52; Meme’s Story, *supra* note 56.

86 Transgender or gender non-conforming people endure humiliation and physical and sexual abuse in incarceration, and they often fear reprisal for using legal remedies. Transgender or gender non-conforming people often must also endure solitary confinement. Issues: Police, Jails & Prisons, National Center for Transgender Equality, <http://www.transequality.org/issues/police-jails-prisons>.

87 See Barry Holman & Jason Ziedenberg, The Dangers of Detention: The Impact of Incarcerating Youth in Detention and Other Secure Facilities—A Justice Policy Institute Report (2011), http://www.justicepolicy.org/images/upload/06-11_rep_dangersofdetention_jj.pdf (examining the growing impact of youth detention).

88 Interview by Linda of Leslie, *supra* note 52.

In 2003 the City of Los Angeles adopted the CEDAW Ordinance.⁸⁹ By doing so, Los Angeles joined many other cities globally and nationally that are choosing to give meaning to international human rights principles at the local level. Through the CEDAW Ordinance, the City of Los Angeles has bound itself to ensuring “equality for women and girls in the civil, political, economic, social, and cultural arenas.”⁹⁰ This commitment includes supporting the human rights of reentering women.

“My vision is that L.A. City have a relationship with the prison I would like to see the community redefine who is coming out and back into their communities: let the public know that they have been rehabilitated.”⁹¹

CIW Think Tank Member

Consultations with currently and formerly incarcerated women, their communities, and their advocates give concrete and contextualized meaning to the fundamental human rights principles that the City of Los Angeles has committed to through the CEDAW Ordinance. Notably, reentry in Los Angeles implicates a complex web of spheres of government including the City of Los Angeles, Los Angeles County, and the State of California. Although the CEDAW Ordinance binds only the City of Los Angeles, it provides an important framework and set of principles that authorities responsible for reentry throughout Los Angeles should use to ensure responsive policies to community aspirations, human rights, and accountable governance.⁹² Because of the complexity of reentry and the resources contributed by other bodies such as the Los Angeles County Board of Supervisors, City Council, and the CDCR, this Report is relevant for all public authorities that provide reentry services in Los Angeles.

The challenges facing reentering women are enormous, but the City of Los Angeles—working alongside directly impacted communities, community partners, and other spheres of government—has the ability to safeguard their dignity and eliminate discrimination. This Report is an important step towards ensuring that Los Angeles lives up to its commitments and its potential. It makes the case for the responsibility that the Mayor’s Office of Reentry and other public authorities have to pursue a human rights–based approach to reentry in Los Angeles: an approach grounded in the inherent worth of every human being and the leadership of directly impacted populations.⁹³ As a member of the CIW Think Tank stated, “This is a document that is about healing and constructive criticism.”⁹⁴

Although the CEDAW Ordinance binds only the City of Los Angeles, it provides an important framework and set of principles that authorities responsible for reentry throughout Los Angeles should use to ensure responsive policies to community aspirations, human rights, and accountable governance.

89 L.A., Cal., Ordinance No. 175735 (Dec. 19, 2003).

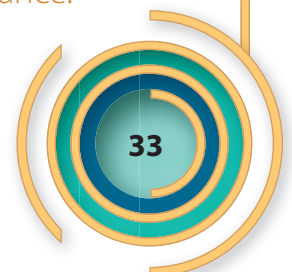
90 *Id.*

91 Interview by Linda of Leslie, *supra* note 52.

92 For a broader introduction of the implementation of human rights through municipal government in the United States, see COLUM. L. SCH., HUMAN RIGHTS INST., *supra* note 42.

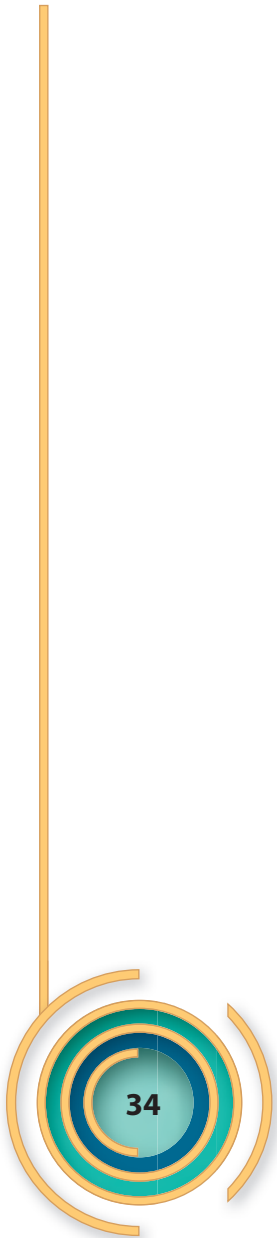
93 *Human Rights: A Global Vision*, NAT’L ECON. & SOC. RIGHTS INITIATIVE, <https://www.nesri.org/human-rights/human-rights-a-global-vision> (last visited May 6, 2018).

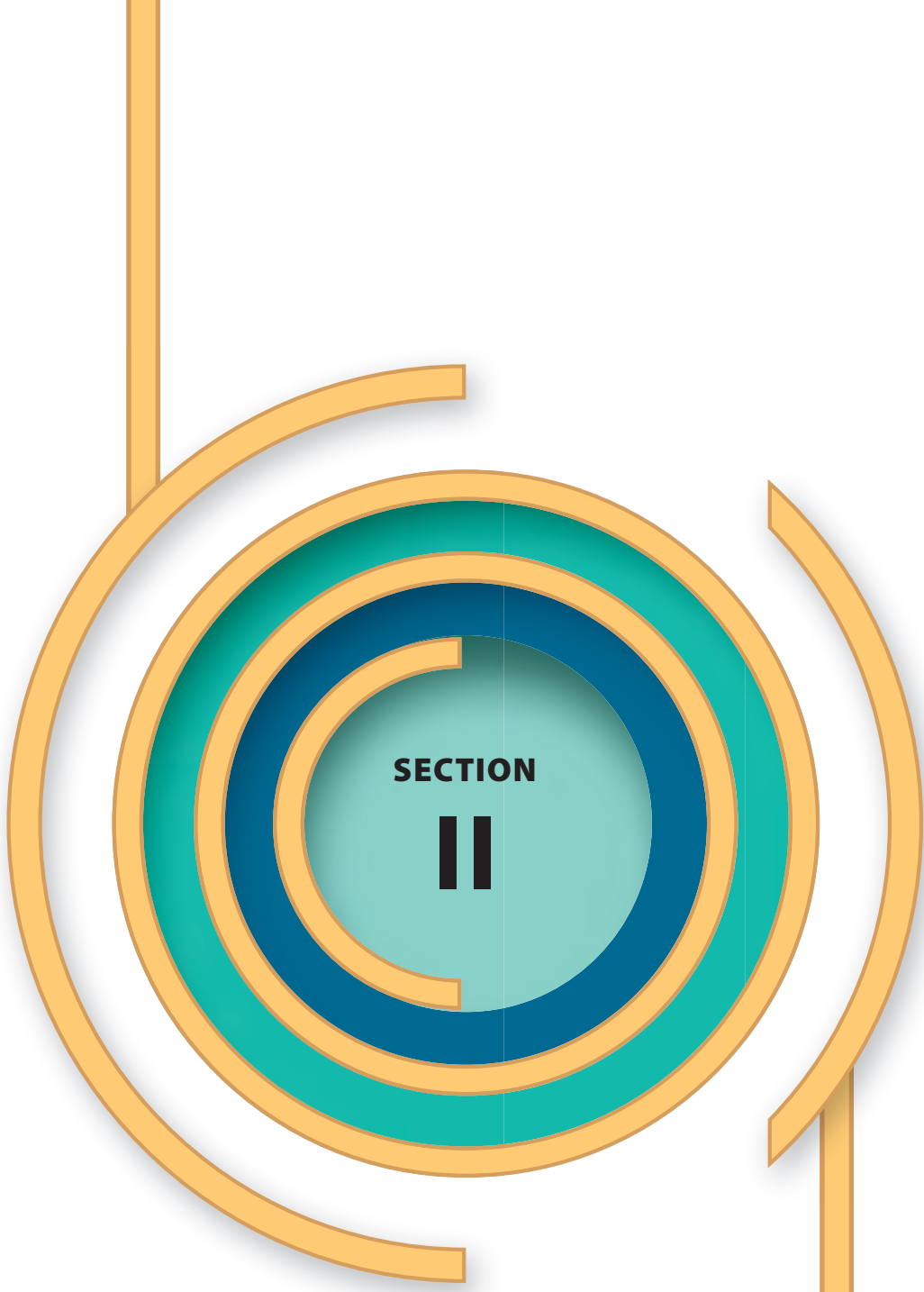
94 Interview by Linda of Leslie, *supra* note 52.



Section 1—Reentry: The Landscape, The Lives, The Laws

Section II details reentering women’s human rights to housing and employment and identifies important features of these rights in the context of Los Angeles. Section III surveys resources currently available in Los Angeles and identifies significant shortcomings that the Mayor’s Office of Reentry and other government actors must address. The Report concludes with recommendations.





SECTION

II

**REENTERING
WOMEN'S HUMAN
RIGHTS TO
HOUSING AND
EMPLOYMENT**

SECTION II

REENTERING WOMEN’S HUMAN RIGHTS TO HOUSING AND EMPLOYMENT

A. HUMAN RIGHTS-BASED APPROACH TO REENTRY

With the passage of the CEDAW Ordinance,⁹⁵ Los Angeles became a part of a growing global trend of utilizing a human rights framework for local governance.⁹⁶ The purpose of the CEDAW Ordinance is to implement the principles underlying CEDAW,⁹⁷ the most fundamental of which are that women should fully enjoy human rights and fundamental freedoms and that they should do so on an equal basis with men.⁹⁸ By adopting the CEDAW Ordinance, Los Angeles committed itself to a human rights framework in its creation of policies that affect women, including in the areas of reentry housing and employment.⁹⁹

One of the central purposes of this Report is to explain what adopting a human rights approach to reentry means for the women of Los Angeles, the City of Los Angeles, and other

95 L.A., CAL., ORDINANCE 175735 (Dec. 19, 2003). See also L.A. MAYOR’S OFFICE, EXEC. DIRECTIVE 11: GENDER EQUITY IN CITY OPERATIONS (2015), https://www.lamayor.org/sites/g/files/wph446/f/page/image/ED_11.pdf. This development is also part of the “Cities for CEDAW” campaign, which has been successful at utilizing the momentum behind local implementation of human rights standards to push for gender equality at the local level. See generally Women’s Intercultural Network & the Leadership Conference Educ. Fund, *Cities for CEDAW: A Campaign to Make the Global Local* (2016), http://citiesforcedaw.org/wp-content/uploads/2017/01/CEDAW-toolkit_May-2016.pdf.

96 See STEPHEN P. MARKS & KATHLEEN A. MODROWSKI, HUMAN RIGHTS CITIES: CIVIC ENGAGEMENT AND SOCIETAL DEVELOPMENT 39-50 (2008) (describing the Human Rights Cities movement as one that “combine[s] participation, empowerment and social change with international solidarity”). See also Interview with Pete White, *supra* note 40 (discussing how local grassroots organizations in Los Angeles, such as LA CAN, have used a human rights framework for their work).

97 ORDINANCE 175735, *supra* note 89, at § 1.B (“It is the goal of the City of Los Angeles to implement the principles underlying the Convention on the Elimination of All Forms of Discrimination Against Women”).

98 Convention on the Elimination of all Forms of Discrimination Against Women, 1249 U.N.T.S. 13 [hereinafter CEDAW].

99 To say that the passage of the CEDAW Ordinance commits Los Angeles to upholding “human rights” in general, as defined in the full panoply of human rights instruments at the international level, would be too sweeping and simplistic. Rather, the Ordinance commits Los Angeles to respecting certain human rights principles in relation to women, which cannot be understood without reference to the body of international human rights law.

Women should fully enjoy human rights and fundamental freedoms, and they should do so on an equal basis with men.

local government authorities responsible for the reentry landscape in Los Angeles. Crucially, individual international human rights treaties such as CEDAW must be understood in the context of the broader international human rights framework. To give full meaning to CEDAW’s requirement that state actors realize the human rights of women, “human rights” must be understood as articulated in seminal international human rights instruments such as the UDHR, the ICCPR, and the ICESCR.¹⁰⁰ As a result, this Report includes an analysis of these instruments as they apply to reentering women’s rights to employment and housing.

Community Participation in Articulating the Meaning of Human Rights

The international human rights framework affirms the right of people to participate in legislative decisions that affect their lives.¹⁰¹ The UDHR, the foundational document of the human rights regime, states that “[e]veryone has the right to take part in the government of [her] country...the will of the people shall be the basis of the authority in government[.]”¹⁰² Similarly, the ICCPR guarantees every citizen the right and the opportunity to take part in public affairs.¹⁰³ The Human Rights Committee, the treaty body charged with the interpretation of the ICCPR, has explained that the right to participation in public affairs includes a corresponding duty on local government authorities to “[t]ake appropriate measures to encourage publicly and promote the importance of participation of all citizens in political and public affairs, *in particular women, persons belonging to marginalized groups...and persons in vulnerable situations*[.]”¹⁰⁴ The United States has ratified the ICCPR, creating a binding obligation on all spheres of government—including the City of Los Angeles—to respect and promote the right of participation.¹⁰⁵

Beyond the right to participate in the general public affairs and policy of the state, international law also supports a general principle of consultation with specific groups of citizens regarding policies that will affect them. Many human rights instruments that focus on groups, such as

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- 100 OFFICE OF THE U.N. HIGH COMM’R FOR HUMAN RIGHTS, THE CORE INTERNATIONAL HUMAN RIGHTS TREATIES (2006), <http://www.ohchr.org/Documents/Publications/CoreTreatiesen.pdf> (describing the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights (ICESCR) as “core” documents in human rights law). Although the U.S. has not ratified the ICESCR, local governments should nonetheless voluntarily comply with its standards as Los Angeles and other cities have chosen to do with CEDAW, which has also not been ratified by the U.S.
- 101 Magdalena Sepúlveda Carmona (Special Rapporteur on Extreme Poverty and Human Rights), *Report on the Right to Participation of People Living in Poverty*, § 4, U.N. Doc. A/HRC/23/36 (Mar. 11, 2013) (arguing that a right to participation for affected groups exists under international law).
- 102 G.A. Res. 217 (III) A, Universal Declaration of Human Rights (Dec. 10, 1948) [hereinafter UDHR].
- 103 See G.A. Res. 2200A (XXI), International Covenant on Civil and Political Rights (Dec. 16, 1966) (entered into force Mar. 23, 1976) [hereinafter ICCPR] (“Every citizen shall have the right and the opportunity... (a) To take part in the conduct of public affairs.”).
- 104 Human Rights Council Res. 27/24, U.N. Doc. A/HRC/27/L.29/Rev.1 (Sept. 25, 2014). (emphasis added).
- 105 Mary McLeod, Acting Legal Advisor, National Association of Attorneys General, Remark on The Role of State, Territorial, and Local Government in Promoting, Respecting, and Defending Human Rights at the National Association of Attorneys General National Conference—Washington, D.C. (Feb. 25, 2015) (discussing the binding obligations created by the ICCPR at all levels of government).

indigenous peoples,¹⁰⁶ people living in poverty,¹⁰⁷ and developing nations,¹⁰⁸ specifically provide for consultation with the aforementioned groups. This extends beyond the guarantee of equal access to participation in the political process: it provides for affected groups to have a seat at the table, helping to create and implement policy, even after elections have been decided.

People with past criminal justice involvement are one such marginalized and vulnerable group, so reentering women should participate in creating the policies that will affect them. Felony voter disenfranchisement heightens the need to engage with this group: many incarcerated women are excluded outright from formal political participation for long periods of time.¹⁰⁹ Further, because incarcerated women are not permitted to govern themselves or to participate in creating prison policy during incarceration, they lack opportunities to develop the skills needed for political engagement on the outside.¹¹⁰ The women of the CIW Think Tank expressed their fears that stigma around their former incarcerations would make it difficult for them to be seen as valuable contributors to society upon release.¹¹¹

Because of these particular vulnerabilities of formerly incarcerated women, it is crucial to build avenues for their participation. When local government authorities devise participatory processes for policy creation, they recognize the dignity and agency of affected communities in compliance with international human rights law. For community participation to be meaningful, it cannot be superficial, tokenistic, or symbolic, undertaken merely to legitimize the government’s decisions.¹¹² Instead, governments must be open to truly bottom-up processes in which the input of affected people can change policy and practice. Because affected groups often hold vital information based on their direct and divergent experience, their input can lead to more effective policymaking.

Many incarcerated women are excluded outright from formal political participation for long periods of time.

106 G.A. Res. 61/295, Declaration on the Rights of Indigenous Peoples (June 29, 2006), art. 18 (“Indigenous peoples have the right to participate in decision-making in matters which would affect their rights”).

107 Sepúlveda Carmona, *supra* note 101.

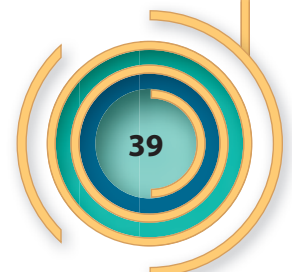
108 G.A. Res. 55/2, United Nations Millennium Declaration (Sept. 8, 2000), § I, para. 5 (“These efforts must include policies and measures, at the global level, which correspond to the needs of developing countries and economies in transition and are formulated and implemented with their effective participation.”).

109 In California, people with felony convictions are legally disenfranchised during incarceration and parole. *Voting in Your State* (“California”), NONPROFIT VOTE, <http://www.nonprofitvote.org/voting-in-your-state/special-circumstances/voting-as-an-ex-offender/#California>. After this period of forced non-engagement with electoral politics, public authorities should work to reengage formerly incarcerated people, both formally because of the need to re-register, and informally because of the collateral impacts of long-term disempowerment.

110 Consultation with CIW Think Tank (Nov. 21, 2016). See also CIW Think Tank Feedback on Draft Five of the Report, at 19 (“Inmates’ voices are not heard because we are in prison. Not only do we not get to vote but no one listens to us. Policy is normally just handed to us.”); Regina Austin, *The Shame of it All: Stigma and the Political Disenfranchisement of Formerly Convicted and Incarcerated Persons*, 36 *COLUM. HUM. RTS. L. REV.* 173, 174-185 (2004).

111 *Id.*

112 Sepúlveda Carmona, *supra* note 101, at § III, para. 17.



Affected communities’ engagement in participatory processes not only leads to better and more workable policies; it also builds skills, knowledge, and empowerment in those communities. For these reasons, the right of participation by incarcerated women is the fundamental basis for the CIW Think Tank’s engagement with the Mayor’s Office of Reentry. It has deeply informed the collaborative process through which the CIW Think Tank and the IHRC produced this Report.

Apart from guaranteeing a general right to participate in governance, international human rights law specifically provides a right of participation for impacted communities in the creation of housing and employment policy.¹¹³ The ICESCR, the treaty that establishes housing as a human right, mandates the immediate creation of housing strategy that “should reflect extensive genuine consultation with, and participation by, all of those affected, including the homeless, the inadequately housed and their representatives.”¹¹⁴ The human rights instruments that elaborate the right to housing also specifically provide for women’s right to participate in the creation of housing policy.¹¹⁵ Likewise, the formation of a national employment strategy based on the concerns of workers and targeted disadvantaged and marginalized groups has similar requirements.¹¹⁶

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- 113 U.N. Comm. on Econ., Soc., & Cultural Rights, General Comment 4 on the Right to Adequate Housing (Art. 11 (1) of the Covenant), para. 12, U.N. Doc. E/1992/23 annex III at 91 (Dec. 13, 1991) [hereinafter General Comment 4]. The UN Special Rapporteur on Adequate Housing bears the mandate to investigate, report on, and make recommendations about the right to housing considering information gained through participatory means, such as country missions and listening to testimony from affected groups and individuals. *History of the Mandate – Adequate Housing*, UNITED NATIONS OFFICE OF THE HIGH COMM’R FOR HUMAN RIGHTS, <http://www.ohchr.org/EN/Issues/Housing/Pages/OverviewMandate.aspx> (last visited May 6, 2018). Per these consultations, the Special Rapporteur recommended that “participation” be included as a necessary element of the right to adequate housing in his 2003 report on women and housing. Miloon Kothari, (Special Rapporteur on Adequate Housing), *Report of the Special Rapporteur on adequate housing*, E/CN.4/2003/55, para. 5 (Mar. 26, 2003). See also U.N. Comm. On Econ., Soc., & Cultural Rights, General Comment 18 on the Right to Work [hereinafter General Comment 18], para. 42, U.N. Doc. E/C.12/GC/18 (Nov. 24, 2005).
- 114 General Comment 4, *supra* note 113, at para. 12. See also Racquel Rolnik (Special Rapporteur on the Right to Adequate Housing), *Basic Principles and Guidelines on Development-Based Evictions and Displacement*, A/HRC/4/18 (2006) (U.S. affirming the right of poor and minority communities to participate in zoning and development decisions which affect their communities).
- 115 For example, the Global Strategy for Shelter, adopted by the UN General Assembly in 1988, states that: “Women, as income-earners, home-makers and heads of households . . . fulfil a crucial role as contributors to the solution of human settlements problems, which should be fully recognized and reflected in equal participation of women in the elaboration of housing policies, programmes and projects” G.A. Res. 43/181, Global Strategy for Shelter to the Year 2000 (Dec. 20, 1988). Similarly, the Habitat Agenda, adopted by 171 countries including the United States, requires local government authorities to “institutionalize a participatory approach” to human settlements “based on a continuing dialogue among all actors involved in urban development . . . especially women” U.N. Conf. on Human Settlements, U.N. Doc. A/CONF.165/14, para. 45(h) (June 14, 1996). The Special Rapporteur on adequate housing, in her 2011 annual report focused on gender and housing policy, stated that “women must have a seat at the table of decision-making, so that they are able to effectively and meaningfully participate in all aspects related to the formulation, design and implementation of housing law, policy and programming.” Raquel Rolnik (Special Rapporteur on the Right to Adequate Housing), *Rep. of the Special Rapporteur on adequate housing*, presented to Human Rights Council, Nineteenth Sess., A/HRC/19/53, §IV, para. 58 (Dec. 26, 2011).
- 116 General Comment 18, *supra* note 113, at para. 31.

Substantive Equality under CEDAW

CEDAW requires freedom from discrimination and substantive equality in the provision of all basic necessities, including housing and employment.¹¹⁷ At the international level, CEDAW create a monitoring body called the CEDAW Committee, which is tasked with providing authoritative interpretations of the treaty. The CEDAW Committee has described the “substantive equality” required by CEDAW as going beyond formal equality with men: “It is not enough to guarantee women treatment that is identical to that of men. [P]ursuit of the goal of substantive equality . . . calls for an effective strategy aimed at . . . a redistribution of resources and power between men and women.”¹¹⁸

Although this Report will discuss disparities in the services and resources available to reentering men and women, its analysis is not focused merely on equalizing disparities. Instead, it advocates for a minimum core of rights protection that local government authorities must afford to reentering men and women alike.¹¹⁹ This approach aligns with the human rights framework’s recognition of basic human dignity.¹²⁰ The human rights framework militates against a race to the bottom approach in which, as long as men’s rights are not respected, women’s rights need not be either.

The CEDAW Committee has also interpreted CEDAW to require improvement of the *de facto* position of women through effective programs and policies.¹²¹ This means that formal legal equality is only the first step towards implementing Los Angeles’s commitments under the CEDAW Ordinance. Inequities that persist notwithstanding anti-discrimination laws must then be addressed by state actors, who bear a responsibility to proactively remove barriers to access and tackle the root causes of gender disparities.

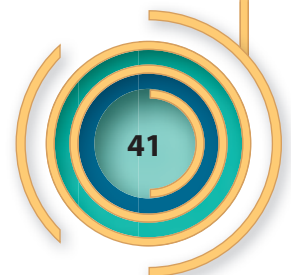
117 CEDAW, *supra* note 98, at art. III (guaranteeing “enjoyment of human rights and fundamental freedoms on a basis of equality with men” where human rights and fundamental freedoms can be interpreted to include the right to housing).

118 CEDAW Committee, General Recommendation No. 25, on article 4, paragraph 1, of the Convention on the Elimination of All Forms of Discrimination against Women, on temporary special measures, § II, para. 8 (2004) [hereinafter General Recommendation 25].

119 States have an obligation to provide all people with a “minimum core” of rights protection under international law. See *Key concepts on ESCRs—What are the obligations of States on economic, social and cultural rights?*, UNITED NATIONS OFFICE OF THE HIGH COMM’R FOR HUMAN RIGHTS, <http://www.ohchr.org/EN/Issues/ESCR/Pages/WhataretheobligationsofStatesonESCR.aspx> (last accessed May 6, 2018).

120 The concept of “human dignity” as the cornerstone of the human rights framework emerges from its centrality in foundational documents such as the UN Charter and the Universal Declaration of Human Rights. See Charter of the United Nations, 26 June 1945, 59 Stat. 1031; see also UDHR *supra* note 102.

121 General Recommendation 25, *supra* note 118, at §II, para. 7.



The specific needs of women have been addressed in international instruments like the Bangkok Rules. International norms emphasize that reentry begins during a prison sentence and create a large role for the state in providing gender-responsive supportive aid to reentering women.

Reentry and Human Rights

Article 10 of the ICCPR requires that the “essential aim” of imprisonment be “reformation and social rehabilitation.”¹²² As stated in the UNSMR, which the United States delegation supported strongly, imprisonment should be “used to ensure, so far as possible, that upon [her] return to society the offender is not only willing but able to lead a law-abiding and self-supporting life.”¹²³ The UNSMR also states that local government authorities must take steps to prepare individuals for release during their incarceration, which should be combined with effective post-release social aid programs.¹²⁴ Basic standards for the treatment of prisoners passed by the United Nations General Assembly include the obligation to create “[w]ith the participation and help of the community and social institutions...favorable conditions...for the reintegration of the [formerly incarcerated person] into society under the best possible conditions.”¹²⁵

The specific needs of women have been addressed in international instruments like the Bangkok Rules, which require that local government authorities “shall design and implement comprehensive pre- and post-release reintegration programmes *which take into account the gender-specific needs of women.*”¹²⁶

These international norms, which the United States helped create, emphasize that reentry begins *during* a prison sentence. They also create a large role for the state in providing gender-responsive supportive aid to reentering women to ensure their success not only in avoiding recidivism, but also in economic and social reintegration. These international norms provide important guidance for understanding Los Angeles’s commitment through its CEDAW Ordinance to respect women’s human rights and fundamental freedoms.

122 ICCPR, *supra* note 103 .

123 First U.N. Congress on the Prevention of Crime and the Treatment of Offenders [Aug. 22–Sept. 3, 1955], Standard Minimum Rules for Treatment of Prisoners, Aug. 30, 1955, U.N. Doc. A/CONF/6/1 para. 58, adopted by the Economic and Social Council Res. 663 (XXIV) C (1957).

124 *Id.* (“Before the completion of the sentence, it is desirable that the necessary steps be taken to ensure for the prisoner a gradual return to life in society. This aim may be achieved, depending on the case, by a pre-release regime...[which] should be combined with effective social aid.”).

125 G.A. Res. 45/111, Basic Principles for the Treatment of Prisoners (Dec. 14, 1990).

126 G.A. Res. 65/229, United Nations Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Offenders (the Bangkok Rules) (Dec. 21, 2010) (emphasis added). The CEDAW Committee, in responding to a complaint by a Belarusian woman who was mistreated in prison, used the Bangkok Rules as a benchmark, arguing that states’ approaches to incarcerated people must be gender-sensitive. Comm. Elimination of Discrimination Against Women, Communication No. 23/2009, U.N. Doc. CEDAW/C/49/D/23/2009, (Sept. 27, 2011) (arguing that there is a “need for a gender-sensitive approach to problems faced by women prisoners”).

B. REENTERING WOMEN’S HUMAN RIGHT TO HOUSING

“Each woman needs access to safe, supportive and drug-free housing.”¹²⁷

Meme, CIW Think Tank Member

This Section elaborates the meaning of the right to housing under international law. It uses the insights and experiences of the CIW Think Tank and their Community Partners to articulate the local meaning of the right to housing for women reentering communities in Los Angeles.

Elaborating the Right to Housing for Reentering Women

In the CEDAW Ordinance, the City of Los Angeles makes the commitment “to ensure, on the basis of equality between men and women ... [t]he right to equal access to ... housing.”¹²⁸ It further states that “[i]t is the goal of the City of Los Angeles to implement the principles underlying [CEDAW] ... by addressing discrimination against women ... in ... housing.”¹²⁹

Throughout the CEDAW Ordinance, there is a repeated commitment to “implement[ing] ... the underlying principles of CEDAW[,]” which include substantive equality and the guarantee of human rights and fundamental freedoms to all women.¹³⁰ Although the CEDAW Ordinance does not specifically guarantee women the right to housing, instead guaranteeing the right to “equal access” to housing, the City of Los Angeles should understand its commitment to the implementation of CEDAW’s “underlying principles” as requiring that local government authorities respect women’s basic human rights, including the right to housing. The centrality of substantive equality within the human rights framework, as discussed above, requires such an approach.

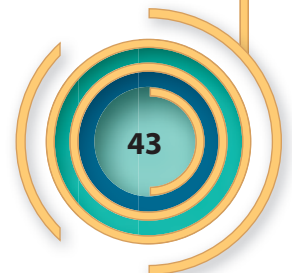
The City of Los Angeles should interpret the principle of “equal access” in the CEDAW Ordinance to require not only equal access between men and women, but also equal access between advantaged and disadvantaged groups of women. This requires an approach that responds to

127 Meme’s Story, *supra* note 56, at 2.

128 ORDINANCE 175735, *supra* note 89.

129 *Id.*

130 *Id.*



The principle of equal access for women cannot be achieved until it is realized for *all women*.

the multiple, intersectional ways in which women are disadvantaged¹³¹—including past criminal justice involvement. The principle of equal access for women cannot be achieved until it is realized for *all women*, including those who face discrimination in housing both because they are women and because of their past criminal justice involvement.¹³²

Although international human rights instruments contemplate some limitations on the rights of people who have been convicted of crimes, these limitations should typically last only for the duration of their sentences.¹³³ Limitations on the rights of formerly incarcerated people after they have reentered society must be aimed at a legitimate purpose, objectively reasonable, narrowly tailored, and proportional.¹³⁴ Broad bans that exclude the formerly incarcerated from housing arguably fail this test, whereas more narrow and targeted restrictions may be permissible.

Two core human rights instruments establish the right to housing—the UDHR¹³⁵ and the ICESCR.¹³⁶ Within the international human rights framework, housing is not merely a commodity,

131 Meghan Campbell, *CEDAW and Women’s Intersecting Identities: A Pioneering Approach to Intersectional Discrimination* (Oxford Hum. Rts. Hub, Working Paper Vol. 2, No. 3, Feb. 2016) (arguing that CEDAW “implicitly includes a commitment to understanding and addressing intersectional discrimination. Women experience disadvantage and discrimination based on their sex and gender and that is inextricably linked to other identities, factors and experiences...”). The ICESCR and Human Rights Committees have both recognized the importance of taking an intersectional approach to identity as well. See U.N. Comm. on Econ., Soc., & Cultural Rights, General Comment 20: Non-Discrimination in Economic, Social and Cultural Rights (art. 2, para. 2 of the International Covenant on Economic, Social, and Cultural Rights), U.N. Doc. E/C.12/GC/20 (June 10, 2009) (“Some individuals or groups of individuals face discrimination on more than one of the prohibited grounds, for example women belonging to an ethnic or religious minority. Such *cumulative discrimination* has a unique and specific impact on individuals and merits particular consideration and remedying.”); see also U.N. Human Rights Comm., CCPR General Comment 28: Article 3 (Equality of Rights Between Men and Women), U.N. Doc. CCPR/C/21/Rev.1/Add.10 (Mar. 29, 2000) (“... discrimination against women is often intertwined with discrimination on other grounds...state parties should address the ways in which instances of discrimination on other grounds affect women in a particular way...”).

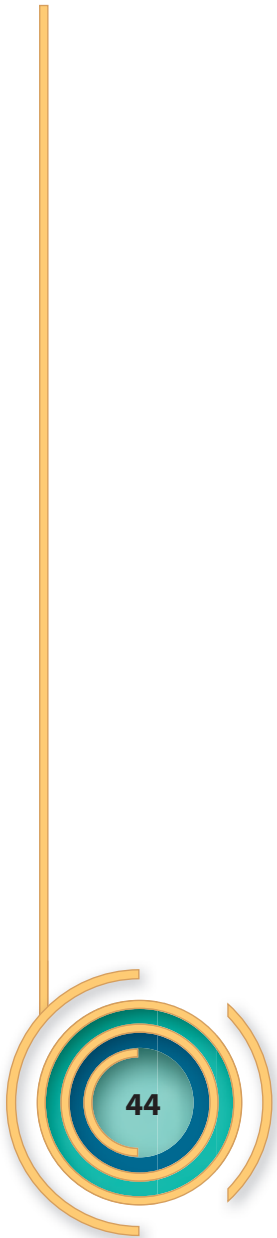
132 CIW Think Tank Feedback on Draft Five of the Report, at 23 (clarifying that women, apart from being discriminated against as women, are also discriminated against “as ex-felons”). These forms of discrimination are interlocking and cannot be understood in isolation from one another.

133 See, e.g., ICCPR, *supra* note 103, at art. 8(3)(b) (exemption from prohibition on forced labor for people serving a prison sentence does not extend beyond the sentence).

134 This is the doctrine of proportionality and has been adopted by most constitutional courts throughout the world, including, arguably, by the United States Supreme Court, as well as by courts which adjudicate claims under international human rights law, such as the Inter-American Court and the European Court of Human Rights. See Juan Cianciardo, *The Principle of Proportionality: The Challenges of Human Rights*, 3 J. Civ. L. Stud. 177, 177-178 (2010).

135 UDHR, *supra* note 102, at art. 25 (“Everyone has the right to a standard of living adequate for the health and well-being of himself and of [her] family, including ... housing”).

136 International Covenant Economic, Social and Cultural Rights (ICESCR), art. 11(1), Dec. 16, 1966, 993 U.N.T.S. 3 (stating that every person has the right to an “adequate standard of living ... including ... housing ...”) [hereinafter ICESCR]. Although the United States has not ratified the ICESCR, because it is a signatory, it is bound to refrain from violating the object and purpose of the treaty.



but rather a foundation for the realization of other human rights and the basis upon which individuals and families can live in peace, security, and dignity.¹³⁷

The ICESCR Committee, the treaty body charged with interpreting ICESCR, has provided further guidance on the meaning of “adequate housing” in its General Comment 4.¹³⁸ The Comment explains that the right to adequate housing has at least seven characteristics: security of tenure, availability of services, affordability, habitability, accessibility, location, and cultural adequacy. This Section will detail the five characteristics most salient to the CIW Think Tank’s assessment of the needs of women reentering Los Angeles.

Security of Tenure

Security of tenure means that housing must include legal and practical protection against threats to security and stability, such as forced eviction or harassment.¹³⁹ Because security of tenure is focused on providing legal and procedural protections, it is often best fulfilled by ensuring access to counsel, creating fair administrative policies, and ensuring that affected communities understand their rights.

Security of Tenure for Women Returning to Los Angeles

In the experience of CIW Think Tank members and others known to them, transitional housing programs have strict rules that are often arbitrarily enforced, leaving women at constant risk of being removed.¹⁴⁰ Ideally, transitional housing for reentering women would take an approach more in line with the City of Los Angeles’s “housing first” approach to homelessness, which removes barriers to housing access such as onerous zero tolerance rules against substance abuse.¹⁴¹ Such an approach recognizes that stable housing is a prerequisite to addressing deeper systemic issues like homelessness and the cycles of trauma experienced by criminal justice-involved women. Because stable housing is the basis upon which returning women can build deeper changes, loss of housing should never be inflicted arbitrarily or as a punishment for routine infractions or difficult parts of the substance abuse recovery process, such as relapse.

Housing is not merely a commodity, but rather a foundation for the realization of other human rights and the basis upon which individuals and families can live in peace, security, and dignity.

137 UNITED NATIONS OFFICE OF THE HIGH COMM’R FOR HUMAN RIGHTS, *supra* note 113.

138 General Comment 4, *supra* note 113. The purpose of General Comments is to interpret the broad language of a treaty and create clear guidelines to which implementing governments can be held accountable. NAT’L LAW CTR. ON HOMELESSNESS AND POVERTY, “SIMPLY UNACCEPTABLE:” HOMELESSNESS AND THE HUMAN RIGHT TO HOUSING IN THE UNITED STATES 2011 20 (2011), https://www.nlchp.org/Simply_Unacceptable (last visited May 6, 2018).

139 General Comment 4, *supra* note 113, at § 8(a).

140 Consultation with CIW Think Tank, *supra* note 110.

141 *Housing First*, OFF. OF LOS ANGELES MAYOR ERIC GARCETTI <https://www.lamayor.org/housing-first> (last visited May 6, 2018). See also Interview with Anna Cho Fenley, Californians for Safety and Justice, in L.A., Cal. (Nov. 18, 2016) (advocating for a housing first policy).

At least one regional human rights tribunal has interpreted affordability to mean that local government authorities have a duty to regulate housing markets in a way that values social justice and the needs of the poor.

Affordability

Affordability means that the cost of housing must not compromise one’s ability to afford other basic necessities and must be commensurate with income levels.¹⁴² At least one regional human rights tribunal has interpreted affordability to mean that local government authorities have a duty to regulate housing markets in a way that values social justice and the needs of the poor, not merely the property rights of landowners.¹⁴³ At the international level, the ICESCR Committee has proposed that public authorities can comply with the affordability element through rent control measures and housing subsidies.¹⁴⁴

Affordability for Women Returning to Los Angeles

Because the housing market in Los Angeles is expensive, it is difficult for returning women to support themselves and afford housing in the city.¹⁴⁵ As a result, affordability is especially important to women reentering Los Angeles. According to the women of the CIW Think Tank, reentering women often find it difficult to afford housing that would allow them to regain custody of their children.¹⁴⁶ Women report that family reunification, a crucial aspect of realizing the human right to private and family life,¹⁴⁷ is one of the major reasons they seek stable housing. For women reentering Los Angeles, this element means not just affordable housing, but affordable housing that is suitable for family reunification.

142 General Comment 4, *supra* note 113, at § 8(c).

143 See *James and Others v. U.K.*, 98 Eur. Ct. H.R. (Ser. A) (1986) (finding rent control policy to be justified even though it infringed landlord property rights because housing is a “prime social need, the regulation of which cannot entirely be left to the play of market forces.”). See also *Mellacher and Others v. Austria*, 169 Eur. Ct. H.R. (Ser. A) (1989) (finding that the social interest in ensuring affordable housing outweighs landlord property interests).

144 General Comment 4, *supra* note 113.

145 See Interview with Anna Cho Fenley, *supra* note 141 (describing the difficulty reentering women face finding a job that would pay enough to allow them to afford LA housing prices).

146 See *Meme’s Story*, *supra* note 56, at 1 (“Women with children to support have an even tougher time. The first thing they want to do is get their kids back and provide for them. The burden of supporting a family is overwhelming when you can’t even provide for yourself.”).

147 UDHR, *supra* note 102, at art. 8.

Accessibility

Accessibility requires that state actors remove barriers to accessing housing, especially those that affect vulnerable groups.¹⁴⁸ The ICESCR Committee states that vulnerable groups “should be ensured some degree of priority consideration in the housing sphere. Both housing law and policy should take fully into account the special housing needs of these groups.”¹⁴⁹ Recognizing that people cannot take advantage of rights that they do not understand or feel empowered to demand, the Special Rapporteur on Adequate Housing has added the additional elements of education and empowerment to fulfil the right to housing.¹⁵⁰ The Special Rapporteur on Adequate Housing has also recommended adding the element of access to information to the analysis of state compliance with the right to housing.

Accessibility requires that state actors remove barriers to accessing housing, especially those that affect vulnerable groups.

Accessibility for Women Returning to Los Angeles

In consultations with the CIW Think Tank, women noted that trauma is one of the central barriers they face when accessing services, including housing.¹⁵¹ Achieving accessibility in Los Angeles thus entails addressing incarcerated women’s trauma and providing post-incarceration trauma-informed services. Examples include programs like CCTRP, which allows women to transition back into their communities while receiving treatment for substance abuse and trauma.¹⁵²

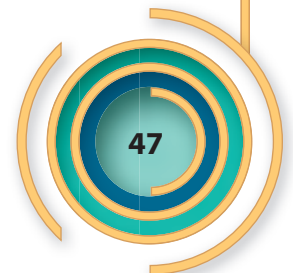
148 This right to the removal of barriers to access for women, was reiterated in the Beijing Platform produced at the Fourth World Conference on Women in 1995 by over 17,000 participants and 30,000 activists from around the world. The Beijing Platform set an agenda for the realization of women’s equality globally and called upon states to: “Enable women to obtain affordable housing...by, among other things, removing all obstacles to access, with special emphasis on meeting the needs of women[.]” Fourth World Conference on Women, Report of the Fourth World Conference on Women, U.N. Doc. A/CONF.177/20 (Sept. 15, 1995). Similarly, The Istanbul Declaration, adopted at the second United Nations Conference on Human Settlements in 1996, calls upon states to support community projects, policies and programs that aim to remove all barriers to women’s access to affordable housing. Fourth United Nations Conference on the Least Developed Countries, Draft Istanbul Declaration, para. 78(e), A/CONF.219/L.1 (May 12, 2011). The Istanbul Declaration was partly crafted with the help of mayors of major U.S. cities, showcasing the pivotal role that local governments have played in creating international norms around housing.

149 General Comment 4, *supra* note 113.

150 Raquel Rolnik, *supra* note 79. UNITED NATIONS OFFICE OF THE HIGH COMM’R FOR HUMAN RIGHTS, *supra* note 113 (describing the UN Special Rapporteur on Adequate Housing’s mandate which requires her to investigate, report on, and make recommendations about the right to housing in light of information gained through participatory means, such as country missions and listening to testimony from affected groups and individuals.)

151 See Interview with Jamie, Elaine, and Michelle, formerly incarcerated women, in L.A., Cal. (Nov. 19, 2016) (stating that mental health services are needed to ensure women can find housing and employment); Paige Linville, CIW Think Tank, *Criminalization of Trauma*, *supra* note 40, at 6; Interview with Anna Cho Fenley, *supra* note 141 (describing the “trauma aspect” of the housing discussion and fears reentering women may have about living alone for the first time). Los Angeles has committed to providing equal access to health care, which includes treatment for mental health issues related to trauma, for women in the CEDAW Ordinance. ORDINANCE 175735, *supra* note 89, at § B(4).

152 Interview with Jamie, Elaine, and Michelle, *supra* note 151 (stating that CCTRP was extremely helpful). *But see* Consultation with CIW Think Tank, *supra* note 110 (noting that people who have committed violent offenses are usually barred from CCTRP).



It is the CIW Think Tank’s view that state authorities should provide more transitional housing like CCTRP specifically for women.¹⁵³ This is a view echoed by formerly incarcerated women— since transitional housing and family reunification are two key elements of successful reentry.¹⁵⁴

In addition, the CIW Think Tank identified the following as crucial to housing accessibility in Los Angeles:

- The elimination of discrimination;
- Access to identification cards;
- Access to credit reporting; and
- Access to transportation.

For currently and formerly incarcerated women in Los Angeles, education must start early in their incarceration, with “resources made available through community partners and peer mentors” in time to allow women to secure housing “one year prior to their parole date[s].”¹⁵⁵ This means that families should also receive education about what to expect when a family member returns from a period of incarceration.

It is the CIW Think Tank’s position that in the context of Los Angeles, access to information about affordable public housing, especially housing that permits family reunification, is crucial for successful reentry.¹⁵⁶

Location

The location element requires that state actors situate housing near resources necessary for people to meet their basic needs, such as employment, food, transportation, health care, schools, and childcare. State actors must also take into account the financial burdens of long-distance travel on low-income communities when they craft housing policy.¹⁵⁷

Location for Women Returning to Los Angeles

For formerly incarcerated women in Los Angeles, the CIW Think Tank stresses that the location element must prevent state actors from forcing these women to return to areas where they will face peer and economic pressures to reoffend, or where they may be triggered by substance abuse or mental health issues. The CIW Think Tank supports the principle that upon release, women “should be able to go where they feel they have the most support.”

153 CIW Think Tank, *Thoughts on Report and Next Steps for the Think Tank*, at 2 (Sept. 19, 2016).

154 Interview with Jamie, Elaine, and Michelle, *supra* note 151.

155 CIW Think Tank, *Timeline for Reentry* at 1 (Oct. 9, 2016).

156 See *Thoughts on Report and Next Steps for the Think Tank*, *supra* note 153.

157 General Comment 4, *supra* note 113.

Cultural Adequacy

Cultural adequacy requires state actors to design housing policy that maintains strong pluralistic communities.¹⁵⁸

Cultural Adequacy for Women Returning to Los Angeles

Current and formerly incarcerated women in Los Angeles communicated that periods of incarceration can strain family and community ties. This must be addressed with reintegration and mediation strategies that support understanding and healing in communities.¹⁵⁹ It is the view of the CIW Think Tank that the cultural adequacy requirement for Los Angeles entails providing support for family reunification. Because many women in prison have children, one suggestion is that state authorities provide child therapy in order to prepare children to reunite with their mothers.¹⁶⁰ It is essential that the process of family reunification begin during a woman’s incarceration in order for the transition into family life to be a success.¹⁶¹

Building community among formerly incarcerated people and working together through peer mentorship on the outside are further essential components for effective reentry.¹⁶²

Because many women in prison have children, one suggestion is that state authorities provide child therapy in order to prepare children to reunite with their mothers.

C. RIGHT TO EMPLOYMENT FOR WOMEN RETURNING TO LOS ANGELES

The ability of individuals to provide for themselves and their families and to attain an adequate standard of living cannot be divorced from the right to work. This is particularly true for vulnerable populations subject to exclusionary and discriminatory policies that impede them from entering the labor market. This section explains how the right to work is understood in the international sphere. It also articulates the views of the CIW Think Tank as informed by the experiences of its members, other women incarcerated at CIW, and community reentry advocates on what the human right to employment entails for women reentering Los Angeles.

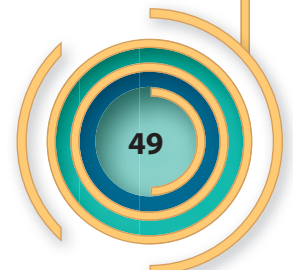
158 Lisa T. Alexander, *Occupying the Constitutional Right to Housing*, 94 NEB. L. REV. 245, 254 (2015).

159 See Interview with Leslie, *supra* note 17, at 1 (“I envision a system where the family and the parolee both heal, even though it is not always best for the parolee to go home [to the family].”).

160 *Id.*

161 *Id.*

162 See, e.g. Meme’s Story, *supra* note 56, at 2 (“[M]entor[s] would act as living proof that change is possible.”). See also Consultation with CIW Think Tank, *supra* note 110. Members of the Think Tank also spoke positively about successful models of mentorship programs engaged in by community partners, which can be supported and scaled up to meet the growing needs of this population. See *id.* (advocating for the expansion of accessibility of mentorship programs like those offered by Anti-Recidivism Coalition (ARC) and InsideOUT Writers).



Article 11 of CEDAW states that the right to work is “an unalienable right of all human beings.”

Elaborating the Right to Employment for Women Returning to Los Angeles

Article 11 of CEDAW states that the right to work is “an unalienable right of all human beings”¹⁶³ and requires state parties to take measures to eliminate discrimination related to employment. Even prior to CEDAW’s adoption, the world’s states made clear their commitment to the right to work in the UDHR. Article 23 of the UDHR upholds the rights of *everyone* to work, to receive equal pay for equal work, and to gain remunerations that make possible an existence worthy of human dignity. The ICESCR also enshrines the right to work, which is first on the treaty’s list of specific rights it obligates states to uphold.¹⁶⁴ Article 6(2) articulates the specific obligations and measures that states must take to realize the right to work. These include a requirement that states institute “technical and vocational guidance and training programs, [and] policies and techniques” to achieve the goals of steady development and “full and productive employment.”¹⁶⁵

The ICESCR Committee provides additional guidance in General Comment No. 18 on the Right to Work. Fulfilling the right to work requires that the type of work be freely chosen and that individuals not be unfairly deprived of work.¹⁶⁶ Moreover, “work” from a human rights perspective means “decent work” that allows individuals to support themselves and their families.¹⁶⁷ The ICESCR Committee makes clear that ensuring this right requires fulfilling three major elements: (1) availability, (2) accessibility, and (3) acceptability and quality.¹⁶⁸

Availability

Availability requires state authorities to “have specialized services to assist and support individuals in order to enable them to identify and find available employment.”¹⁶⁹ Part of expanding the universe of available jobs necessarily involves protecting each woman’s right to the same employment opportunities as other groups, including the application of the same criteria for selection in employment matters.¹⁷⁰

Availability for Women Returning to Los Angeles

CIW Think Tank consultations and community partner insights reveal what is necessary to realize the element of availability in Los Angeles. Women who are released must develop the skills

163 CEDAW, *supra* note 98, art. 11(a).

164 ICESCR, *supra* note 136, art. 6.

165 *Id.* at art. 6.

166 General Comment 18, *supra* note 113, at para. 4.

167 *Id.*, at para. 7.

168 *Id.*, at para. 12.

169 *Id.*, at para. 12(a).

170 CEDAW, *supra* note 98, art. 11.

necessary to navigate the daunting experience of searching for employment.¹⁷¹ To that end, it is critical that local government authorities provide women with the guidance, education, and information necessary to facilitate their search. It is equally important that the government provide each woman with specialized services as early as possible.¹⁷² Specialized services such as assigning case managers and mentors to support and assist all women with finding work—from the moment they are incarcerated to the point at which they obtain employment—are critical.¹⁷³ Mentorship programs can be particularly effective: people that have successfully reentered are familiar with the process and can provide valuable guidance concerning the job search and skill-building.¹⁷⁴

Programs and partnerships are needed to inform incarcerated women about industries with high employment demand and to connect reentering women with industry representatives so they can secure employment as soon as possible after release.¹⁷⁵ This connection should include periodic job and information fairs so that women have the opportunity to secure employment even prior to release.¹⁷⁶

Public authorities in Los Angeles should provide community-based transitional programs that allow for gradual integration back into society. Allowing women to serve the final portion of their sentence outside of prison can reduce the shock of immediate reentry, and local government authorities can provide helpful services in a structured environment.¹⁷⁷ For these reasons, such programs are “associated with far better outcomes than [traditional] incarceration.”¹⁷⁸ Because these programs are so important, the city has a duty to ensure these are open to as many women as possible and that disqualifying criteria are limited.¹⁷⁹

In addition, a centralized information source is needed so women can identify resources to find and secure employment. Local government is the ideal authority for women to turn to because it is typically involved to some degree in each step of reentry. The Mayor’s Office of Reentry can

Allowing women to serve the final portion of their sentence outside of prison can reduce the shock of immediate reentry.

171 Consultation with CIW Think Tank.

172 *Id.*

173 Consultation with CIW Think Tank; Paige Linville, CIW Think Tank, *Education* (Dec. 2, 2016) (unpublished paper), *infra* Appendix A.

174 Consultation with CIW Think Tank; Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *The Actors’ Gang*, in L.A., Cal. (Nov. 9, 2016); Interview with Jamie, Elaine, and Michelle, *supra* note 151; Skype Interview with Sam Lewis, Senior Member Services Coordinator, Anti-Recidivism Coalition (Nov. 29, 2016); Meme’s Story, *supra* note 56.

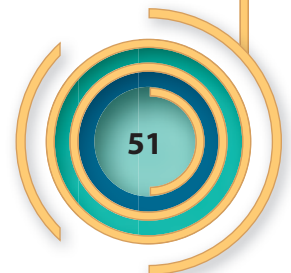
175 Consultation with CIW Think Tank.

176 Interview with Leslie, *supra* note 17.

177 Consultation with CIW Think Tank; Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174; Interview with Jamie, Elaine, and Michelle, *supra* note 151; Paige Linville, *Criminalization of Trauma*, *supra* note 75.

178 Paige Linville, *Criminalization of Trauma*, *supra* note 75 (citing Stephanie Covington, *A Woman’s Journey Home: Challenges for Female Offenders*, in *PRISONERS ONCE REMOVED: THE IMPACT OF INCARCERATION AND REENTRY ON CHILDREN, FAMILIES, AND COMMUNITIES* (Jeremy Travis & Michelle Waul eds., 2003).

179 Interview with Jamie, Elaine, and Michelle, *supra* note 151.



meet this need for centralized information by developing a website with a directory of available opportunities and useful organizations. The system should be available to women as soon as they are incarcerated to maximize their ability to structure their education and career plan accordingly. Further, requiring parole officers and other officials to convey information face-to-face when a woman leaves prison can help fill information gaps.¹⁸⁰ Lastly, some of the most effective mentors and sources of information are often other women who been through the reentry process before.¹⁸¹ It is therefore important that women in need of advice and guidance communicate with mentors without legal repercussions.¹⁸²

Traditional educational and vocational programs are necessary for women to prepare for a life outside of prison and develop the skills necessary for success, but state actors should design these programs to translate easily into gaining employment.¹⁸³ In addition, a portion of the specialized services should go beyond the traditional educational and vocational training that government authorities typically provide.¹⁸⁴ As research has shown, arts courses are highly effective in reducing recidivism amongst people returning to society: local authorities should provide such courses to complement those that teach purely technical skills.¹⁸⁵ These kinds of classes develop the soft skills necessary for succeeding in interviews, the workplace, and everyday life. Because they help with developing cognitive ability, critical thinking, and coping abilities for dealing with emotions and trauma, arts programs should be an essential part of any curriculum. Moreover, the design of *all* the necessary “specialized” services *must* take trauma and healing into account due to the prevalence of trauma among reentering women and its impact on effective rehabilitation.¹⁸⁶

Services to achieve the element of availability would entail close partnerships between the City of Los Angeles and community partners, in addition to state programs, to help women obtain the basic skills necessary for employment following release.

180 Consultation with CIW Think Tank.

181 Consultation with CIW Think Tank; Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174; Interview with Jamie, Elaine, and Michelle, *supra* note 151.

182 Consultation with CIW Think Tank; Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174; Interview with Jamie, Elaine, and Michelle, *supra* note 151. The law currently allows for restrictions on who a person on probation can associate with. 18 U.S.C. § 3563(b)(6) (2015). The U.S. Sentencing Guidelines hold that a defendant “shall not knowingly communicate or interact with [a person who has been convicted of a felony] without first getting the permission of the probation officer.” U.S. SENTENCING GUIDELINES MANUAL § 5D1.3(c)(8) (U.S. SENTENCING COMM’N 2016). Further, this is a standard condition imposed on defendants via the standard Judgment in a Criminal Case form. U.S. DIST. COURT, Judgment in a Criminal Case Form AO 245B, p.6 (Nov. 2016).

183 Meme’s Story, *supra* note 56; Paige Linville, *Education*, *supra* note 173.

184 Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174; Consultation with CIW Think Tank.

185 Valerie Okelola & Angela Irvine, *Evaluating the Actor’s Gang*, IMPACT JUSTICE (2015).

186 Consultation with CIW Think Tank; Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174; Skype Interview with Anna Cho Finley, *supra* note 141; Paige Linville, *Criminalization of Trauma*, *supra* note 75.

Research has shown that arts courses are highly effective in reducing recidivism amongst people returning to society.

Accessibility

The ICESCR Committee explains that the labor market must be accessible and open to *everyone*. The three mandatory means to accomplish the element of accessibility are:

- prohibiting discrimination in access based on “race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, physical or mental disability, health status, sexual orientation, or civil, political, social or *other status*, which has the intention or effect of impairing or nullifying exercise of the right to work on a basis of equality;”¹⁸⁷
- ensuring physical access to the labor market; and
- ensuring that access also includes the “right to seek, obtain, and impart information on the means of gaining access to employment.”¹⁸⁸

Accessibility for Women Returning to Los Angeles

CIW Think Tank consultations illuminate the extreme difficulty and discrimination that women face because of incarceration, which has a direct impact on a woman’s ability to secure employment. State authorities have an obligation to ensure that women have equal employment opportunities and that all employers utilize “the same criteria for selection in matters of employment.”¹⁸⁹ Education and public outreach are necessary components to guaranteeing access to work and the city should implement programs in the public and private sphere to eliminate the kinds of prejudice preventing women from working. Although fundamental shifts may be necessary to eliminate discrimination completely, interim measures reduce the discrimination that reentering women experience.¹⁹⁰ Local governments must take steps to eliminate procedural tools that allow for the ongoing marginalization of this group.¹⁹¹ Background checks are one of the most significant barriers women face when searching for employment or advancing at the jobs they do find. It is therefore critical that applications for employment do not ask for information beyond what is necessary to determine whether an applicant has the appropriate qualifications.¹⁹²

Ensuring access to the labor market also requires local government to address transportation issues.¹⁹³ It is for this reason that the City of Los Angeles must provide training programs and resources within a reasonable area, limiting maximum commute time to one hour,¹⁹⁴ and that

Education and public outreach are necessary components to guaranteeing access to work and the city should implement programs in the public and private sphere to eliminate the kinds of prejudice preventing women from working.

187 General Comment 18, *supra* note 113, at para. 12(b)(i) (emphasis added).

188 *Id.* at paras. 12(b)(ii) – (iii).

189 CEDAW, *supra* note 98, at art. 11(b).

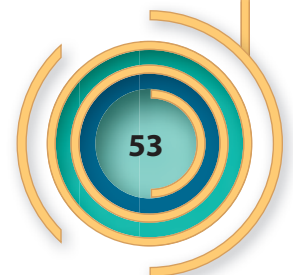
190 *Id.* at art. 4.

191 Consultation with CIW Think Tank; Interview with Jamie, Elaine, and Michelle, *supra* note 151.

192 Consultation with CIW Think Tank; Interview with Jamie, Elaine, and Michelle, *supra* note 151; Skype Interview with Sam Lewis, *supra* note 174.

193 Consultation with CIW Think Tank; Meme’s Story, *supra* note 56.

194 Consultation with CIW Think Tank.



any parole or probation obligations take transportation challenges into account. Any limitations on movement or travel should be flexible enough as to not impede women’s ability to access resources or go to work.

Furthermore, a woman should be allowed to return to an area of her choosing upon reentry. Allowing women to decide which area to live in during their parole gives women the ability to choose a place with the necessary resources and support, and it expands the area she can choose from when searching for employment. Local government should prioritize programs focused on family reunification to strengthen this support network.

Finally, addressing the information gap is also necessary to ensure that formerly incarcerated women have full access to the labor market. Information must be made available to reentering women at multiple points in their reentry and in multiple places to maximize their access to it when they need it.

Acceptability and Quality

With respect to the element of acceptability and quality of work, the ICESCR Committee again emphasizes the concept of “decent work;” the right to freely choose the type of work; and the obligation to maintain good working conditions.¹⁹⁵ CEDAW also requires state authorities to take measures to ensure these subsidiary rights along with the right to equal remuneration and the right to social security “particularly in the cases of retirement, unemployment, sickness, invalidity and old age and other incapacity to work, as well as the right to paid leave.”¹⁹⁶

Acceptability and Quality for Women Returning to Los Angeles

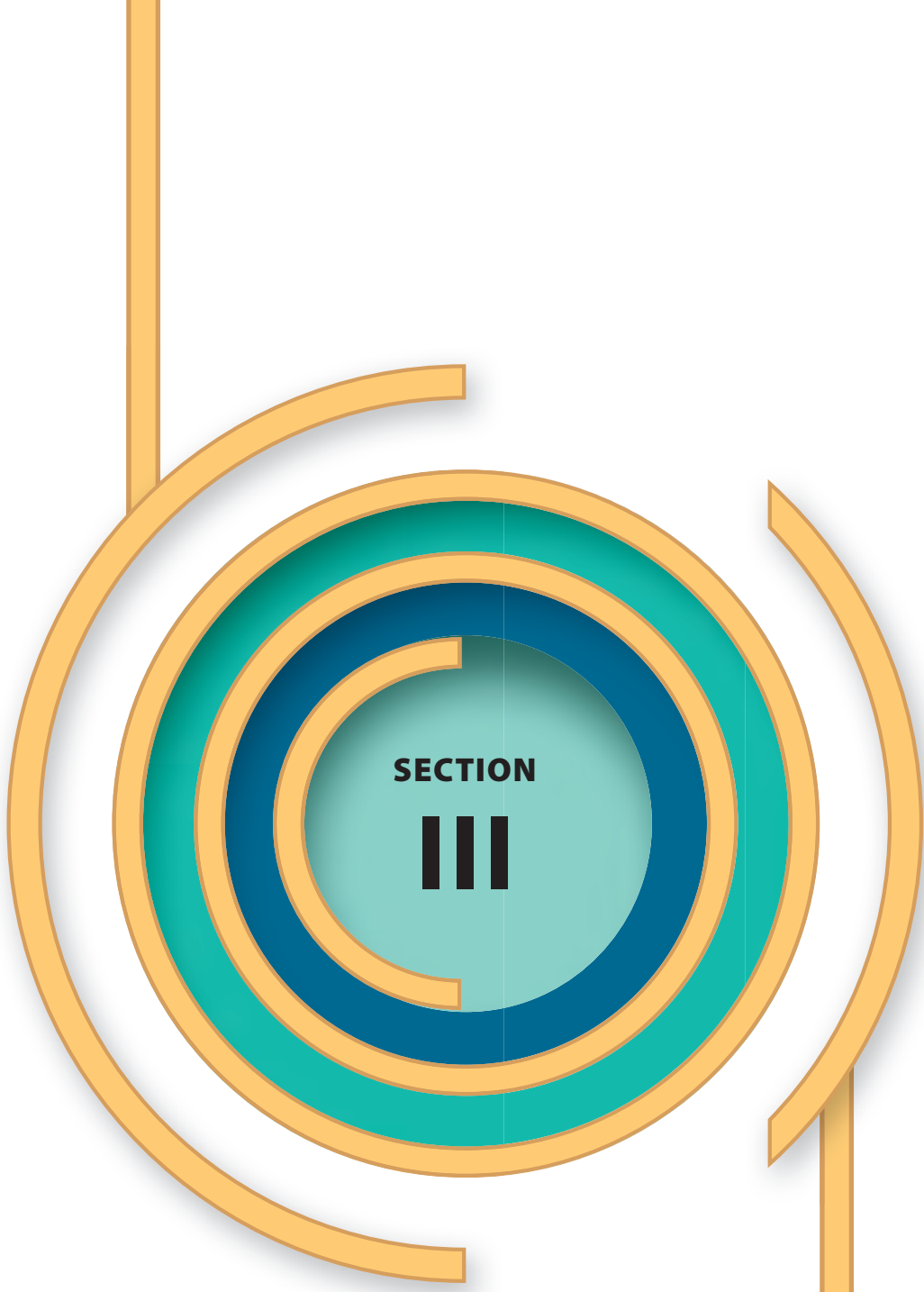
It is the CIW Think Tank’s view that a complaints mechanism is necessary for reentering women to be able to report violations of any of their rights when working.¹⁹⁷ This should include a procedure for investigating complaints and taking appropriate action when a violation is discovered.

Synthesizing the guidance from various treaties with the insight from women who are most impacted makes obligations for the City of Los Angeles clear. By adopting the CEDAW Ordinance, which guarantees the right to work for *everyone*, Los Angeles has committed itself to work to ensure that women reentering society after incarceration are able to find decent work that allows them to attain an adequate standard of living. Doing so means taking steps that allows Los Angeles to respect, protect, and fulfill the right to work for formerly incarcerated women as outlined above.

195 General Comment 18, *supra* note 113, at para. 12(c).

196 CEDAW, *supra* note 98, art. 11(1).

197 Consultation with CIW Think Tank.



**ASSESSING
LOS ANGELES'S
COMPLIANCE WITH
HUMAN RIGHTS**

SECTION III**ASSESSING LOS ANGELES’S COMPLIANCE WITH HUMAN RIGHTS**

This Section analyzes the City of Los Angeles’s compliance in 2016 with local and international human rights legal instruments regarding the housing and employment rights of returning women.¹⁹⁸ It does so by evaluating how available resources address the standards identified in Section II and articulating the reality in which these resources operate. Analysis in this Section focuses on the extent to which state authorities provide the means for women to secure the rights to housing and employment, rather than a *comparative* analysis of the situation of women relative to men. In light of the CEDAW Ordinance, such a comparative analysis is crucial, but requires the commitment of public authorities to collecting and analyzing employment and housing data to determine gender disparities. The focus of this Section is nonetheless in keeping with an international human rights approach to substantive equality described in Section II, which requires states to secure a minimum core of socio-economic rights for women as much as men.

A. HOUSING: POLICY VERSUS REALITY

Applying the five elements of the right to housing, this Section lays out the resources and programs that are currently available in the City of Los Angeles. This Section highlights the reality—i.e. important gaps in resources and services—that local government authorities must address. The scope of this Section is defined by the housing priorities as articulated by CIW Think Tank. Although each of the five elements are discussed, the most salient issues for formerly incarcerated women relate to the elements of affordability, accessibility, and security of tenure.

By applying the five elements of the right to housing, this Section lays out the resources and programs that are currently available in the City of Los Angeles. This Section highlights the reality of important gaps in resources and services that local government authorities must address. The scope of this Section is defined by the housing priorities as articulated by the CIW Think Tank. Although this Section’s discussion contemplates each of the five elements, the most salient issues for formerly incarcerated women relate to the elements of affordability, accessibility, and security of tenure.

198 As mentioned above, this Report was researched and drafted in 2016, notwithstanding its final publication in 2018.

For drug-related criminal activity, violent criminal activity or alcohol abuse, HUD gives local public housing agencies discretionary power to establish standards for admission into the housing program and for termination of housing assistance when a returning formerly incarcerated person seeks to access such housing.

Security of Tenure Applicable Policy

Security of tenure requires legal and practical protections against threats to housing security and stability. Currently incarcerated women fear that their criminal records could compromise the housing tenures of their families who already live in federally administered public housing or use Section 8 vouchers.¹⁹⁹ Both Public Housing and the Section 8 Voucher Program are federal housing programs that exist under HUD and have strict eligibility guidelines for those with past criminal justice involvement. For example, lifetime sex offender registration is an automatic bar from participation in federal housing programs.²⁰⁰ However, for drug-related criminal activity,²⁰¹ violent criminal activity²⁰² or alcohol abuse, HUD gives local public housing agencies discretionary power to establish standards for admission into the housing program and for termination of housing assistance when a returning formerly incarcerated person seeks to access such housing.²⁰³

In the City of Los Angeles, HACLA is the local public housing agency that administers HUD’s housing programs. HACLA has the discretion to deny admission or terminate existing assistance if any family member commits conduct that is described in three standards. The first is if a family member has been convicted of any drug related criminal activity within two years prior to the date of the initial admission interview; or, secondly, has been convicted for a felony for violent criminal activity within two years prior to the date of the initial admission interview or a preponderance of evidence indicates that the applicant has engaged in such activity within three years prior to the date of the initial interview regardless of whether a conviction resulted. Finally, if any family member has engaged in criminal conduct that involved alcohol use or has been convicted on a charge that involved alcohol use within one year of the initial interview.²⁰⁴ Under these standards, HACLA has denied many family member applications due to conviction records and terminated the program for families who have given shelter to formerly incarcerated members among them.²⁰⁵ These standards

199 Consultation with CIW Think Tank in Chino, Cal. (Sept. 9, 2016).

200 24 C.F.R. § 5.856 (2016); 24 C.F.R. § 960.204 (2016); 24 C.F.R. § 982.553 (2016).

201 See 24 C.F.R. 5.100 (2016) (defining drug related criminal activity as “the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug.”).

202 See *id.* (defining violent criminal activity as “any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonable likely to cause, serious bodily injury or property damage.”).

203 See, e.g., 24 C.F.R. 982.553 (outlining situations in which the PHA *must* follow HUD rules and indicating the other situations where the PHA *may* use discretion to make its own standards regarding admission to or termination from the program).

204 HOUS. AUTH. OF THE CITY OF L.A. (HACLA), SECTION 8 ADMINISTRATIVE PLAN 13-1 (2015), <http://www.hacla.org/Portals/0/Attachments/Public%20Documents/S8%20AP%202016%20October%202015.pdf>.

205 See *About Section 8*, HOUS. AUTH. OF THE CITY OF L.A., <http://www.hacla.org/abouts8> (last visited May 6, 2018).

violate and undermine the right to housing for reentering women by implicating the element of security of tenure.

To address this threat to family tenure in Section 8 subsidized housing, HACLA partnered with three community-based organizations to introduce the Section 8 Pilot Reentry Program, which allows families on Section 8 to reunite with formerly incarcerated family members otherwise ineligible for federal housing programming to promote “long-term stability and to reduce recidivism.”²⁰⁶ For participants in the Pilot Reentry Program, HACLA waives criminal background screening criteria for certain crime-based activity.²⁰⁷ The Pilot Reentry Program allows HACLA an alternative to its standard practice of terminating assistance to the entire family household if any family member engages in new criminal activity.²⁰⁸ Instead, under the Pilot Reentry Program, HACLA may remove the person who engages in new criminal activity from the family household rather than removing the entire family household from the program.

Although HACLA operates within city limits, all unincorporated areas within Los Angeles County are under the jurisdiction of another public housing agency, HACOLA.²⁰⁹ In contrast, HACOLA had created standards of admission and termination that were more stringent against individuals with conviction histories than those created by HACLA. However, in April 2015, the Los Angeles County Board of Supervisors voted to amend the application rules for HACOLA’s Section 8 Voucher Program such that individuals on probation or parole will no longer be automatically excluded from participating.²¹⁰ The amended rules brought the HACOLA standards much closer to the federal standards and the HACLA standards by reducing the screening or “look-back” period for drug offenses to no more than two years, developing a definition of “serious violent” crimes that is limited by a three-year “look-back” period, and revising the “other criminal activity” category to define what type of activity would implicate health and public safety concerns.²¹¹ This recent change represents an affirmative step in providing protections for family housing tenure.

Under the Pilot Reentry Program, HACLA may remove the person who engages in new criminal activity from the family household rather than removing the entire family household from the program.

206 Hous. AUTH. OF THE CITY OF L.A., *supra* note 204, at 3-15.

207 Recall that HACLA has the discretionary power to establish its own admission and termination standards only for drug-related criminal activity, violent criminal activity, and alcohol abuse. *See* 24 C.F.R. 982.553, *supra* note 203. Per this discretion, HACLA can waive criminal background criteria for these types of crime-based activities as a part of their admission standards.

208 HACLA’s standard practice is to terminate assistance to the family household if any family member, during the time that the family is *currently* participating in the housing program, (1) is convicted of drug related criminal activity or a preponderance of evidence indicates the family member has engaged in such activity, (2) is convicted of violent criminal activity or a preponderance of evidence indicates that the family member has engaged in such activity, (3) is subject to sex offender registration or engages in sex offense-related criminal activity, and (4) exhibits, under a preponderance of evidence standard, alcohol abuse or a pattern of abuse. *See* Hous. AUTH. OF THE CITY OF L.A., *supra* note 204, at 13-6, 13-8–13-9.

209 *Where We Operate*, Hous. AUTH. OF THE CITY OF L.A., <http://www.hacola.org/public-housing/where-we-operate> (last visited Nov. 20, 2016).

210 *Statement of Proceedings for the Regular Meeting of the Board of Supervisors for the County of Los Angeles*, Cty. OF LOS ANGELES 6 (Apr. 7, 2015), http://file.lacounty.gov/SDSInter/bos/sop/227049_04072015_siglinks.pdf [hereinafter *Statement of Proceedings*].

211 *Id.* at 5.

SERIOUS PROBLEMS WITH HOUSING AVAILABILITY AND FAMILY REUNIFICATION UNDERMINE SECURITY OF TENURE

“The decision lies entirely with the family member already in housing.”²¹²

While HACLA’s Pilot Reentry Program certainly reduces the threat that family reunification involving formerly incarcerated persons poses to a family’s housing tenure, several problems persist in practice that preclude the Pilot Reentry Program from meeting its full potential in realizing the right to housing. First, at the time this report was drafted in 2016, only a total of 75 were slots available for returning men and women. This reality implicates another element to the right to housing, namely accessibility. Although this program exists, there are some barriers to access for reentry because a program participant or formerly incarcerated person may change their mind about the reunification, the owner may not be willing to add a formerly incarcerated person to the lease, or a participant may be unwilling to move from the unit. This compounds the housing challenges reentering women face in a reentry landscape that has fewer resources than those available for reentering men.

A second, larger issue also threatens the Program’s efficacy: the lack of completed participation by “receiving” families who are on the Section 8 Program. To participate in the Pilot Reentry Program, the “receiving” family on the Section 8 Program must first give HACLA approval for the formerly incarcerated family member’s admission into the family household. Next, the family receives admission into the Program, which requires both the family and the formerly incarcerated individual to participate in one year of case management and supportive reentry services, which are provided by the Program’s partnering community-based organizations.

According to HACLA ombudspersons, the services requirement is critical for successful family reunification given that in many family households, an established family relationship may not have existed with the reentering formerly incarcerated family member due to separation during incarceration.²¹³ Upon reunification, these family members must not only share a housing unit, but they must also overcome uncertainties and rebuild relationships. Thus, the supportive services component addresses the challenges that reentering persons and their families face including job placement, skill development and communication barriers. Although some families receiving assistance may not even be receptive to the formerly incarcerated person’s return and refuse to participate, other families who enter the Pilot Reentry Program with the goal of family reunification are, for various reasons, unable to complete the one-year services requirement.

Consultations with the CIW Think Tank and other currently incarcerated women reveal that the factors that preclude full and complete participation by families point to a shortcoming in the supportive services requirement: it has been developed without fully understanding the culture of reunifying families.²¹⁴ This reality implicates the element of cultural adequacy in the right to housing, which is further discussed *infra*. Thus, even if the Pilot Reentry Program facially provides a means of family reunification without sacrificing a family’s security of tenure, it does not yet fully protect against real threats to the right to housing if it cannot facilitate full participation by receiving families.

In comparison, even with the new 2015 application rule amendments, HACOLA’s policies still very much jeopardize the security of tenure for many households that have formerly incarcerated family members or wish to reunify with formerly incarcerated family members. First, HACOLA’s Section 8 waitlist is currently closed and stopped accepting applications in 2010.²¹⁵ Thus, the amendments will not create any changes until the waitlist reopens, thereby preserving threats to security of tenure in the indefinite interim period. Secondly, the amendments have had no impact on HACOLA’s public housing program and thus the more stringent standards regarding conviction histories still prevent many formerly incarcerated individuals from participation.²¹⁶ This reality directly implicates another element to the right to housing—accessibility—as it functionally operates as a barrier to accessing affordable public housing.

212 Telephone Interview with Angela N. Adams, Assistant Director of Section 8, Hous. Auth. of the City of L.A. (Nov. 11, 2016).

213 Telephone Interview with Serina Cannon, Ombudsperson, and Jose Gutierrez, Ombudsperson, Hous. Auth. of the City of L.A. (Nov. 11, 2016).

214 Consultation with CIW Think Tank in Chino, Cal. (Nov. 21, 2016).

215 Rina Palta, *Parolees, Probationers Now Eligible for Section 8 Housing Vouchers in LA County*, KPCC (Apr. 7, 2015), <http://www.scpr.org/news/2015/04/07/50842/la-supervisors-lighten-criminal-background-checks/>.

216 See *Statement of Proceedings*, *supra* note 210, at 5.

Affordability

Applicable Policy

The element of affordability requires that housing costs must not threaten one’s ability to afford other necessities and must be proportional to one’s income levels. Yet affordable housing in Los Angeles is extremely scarce and indeed diminishing. The rise of revitalization, mixed income development projects, and gentrification have also contributed to the unaffordability of California’s private housing market.²¹⁷ As such, for low-income families and individuals, HUD’s housing programs often present the only manageable and truly affordable option. Both the Section 8 Voucher Program and the Public Housing Program allow for approved participating tenants to pay their rent at a subsidized rate; the amount that a participating tenant pays is thus much lower and more affordable than the competitive market value.

In the HACLA-administered Section 8 Voucher Program, approved participating tenants must meet strict eligibility requirements, like income ceilings that are extremely low; they must also meet the federal guideline definitions of a family, senior citizen, or persons with disabilities.²¹⁸ Participation in the Section 8 Voucher program is limited to these groups. Once approved, the Program first administers the housing voucher to the tenant, who must then find a qualifying housing unit where the owner agrees to rent under the program. HACLA must approve both the unit and the lease because the unit must pass the program’s quality standards. Upon unit approval, HACLA pays a rent subsidy to the landlord and the program participant pays the difference between the actual rent and the subsidy.²¹⁹

Similarly, approved participating tenants in the HACLA-administered Public Housing program also pay rent that is subsidized by the federal government—in fact, families in public housing pay no more than thirty percent of their monthly adjusted income for rent and the average monthly rent of public housing residents is \$425.²²⁰ Although Public Housing applicants must also meet income eligibility and adhere to program rules, public housing tenants, once approved, can live in a unit in one of fourteen public housing locations, all of which are managed directly by HACLA and located throughout Los Angeles.²²¹

For low-income families and individuals, HUD’s housing programs often present the only manageable and truly affordable option.

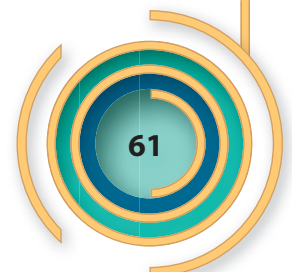
217 See generally URBAN DISPLACEMENT PROJECT, UC BERKELEY, EXECUTIVE SUMMARY (2015), http://www.urbandisplacement.org/sites/default/files/images/urban_displacement_project_-_executive_summary.pdf (discussing how gentrification leads to the displacement of low-income communities of color and renter neighborhoods by focusing on specific case studies of neighborhoods in the Bay Area).

218 HOUS. AUTH. OF THE CITY OF L.A., *supra* note 205.

219 *Id.*

220 *Fact Sheet*, HOUS. AUTH. OF THE CITY OF L.A., <http://hacla.org/Portals/0/Attachments/Fact%20Sheets/HACLA-4PAGER-001.pdf> (last visited Oct. 24, 2018). See also Ben Bergman, *LA Residents Need to Make \$33 an Hour to Afford the Average Apartment*, KPCC (Jan. 15, 2015), <http://www.scpr.org/blogs/economy/2015/01/15/17806/la-residents-need-to-make-34-an-hour-to-afford-ave> (reporting that average monthly rent in a Los Angeles County apartment is \$1,716).

221 *Applying for Public Housing*, HOUS. AUTH. OF THE CITY OF L.A., <http://www.hacla.org/applyforph> (last visited May 6, 2018).



REALITY—RETURNING WOMEN CANNOT ACCESS WHAT SCARCE AFFORDABLE HOUSING EXISTS IN LOS ANGELES

“We are having a hard time with affordable housing in general. Landlords will do anything to push people out of housing . . . It’s an owner’s market. We are just trying to keep people in their housing.”²²²

Even with these two HUD housing programs that aim to realize the affordability element in the right to housing, in Los Angeles (1) the scarcity of affordable housing stock and (2) the chronic lack of funding to develop additional affordable housing units have undermined the realization of the right to housing for formerly incarcerated women.

Although they are certainly more affordable, the two aforementioned HUD housing programs have extremely limited space. Both HACLA and HACOLA have closed their waitlists for their respective Section 8 Programs.²²³ Moreover, though HACLA’s Public Housing waitlist was open as of June 2016, there were already 28,562 families on that waitlist hoping for admission into the program.²²⁴ HACOLA’s Public Housing waitlist is closed.²²⁵ Because the currently available stock of HUD-administered affordable housing is so scarce, formerly incarcerated women are at disadvantage and in competition for this limited resource with program applicants without conviction histories also seeking admission into the HUD programs.²²⁶ Affordability clearly creates a barrier to accessibility, as discussed below.

Moreover, the affordable housing crisis has led to divergent views on possible solutions: the California Legislative Analyst’s Office touts mixed-income revitalization projects and the development of private market-rate housing as key²²⁷ while low-income housing advocates and stakeholders argue for the expansion of federally-subsidized housing.²²⁸ The development of private market-rate housing, though it certainly increases the overall stock of housing, does little to remedy the scarcity of *affordable* housing. Champions of private development argue that building new market-rate housing will indirectly contribute to the supply of housing at the lower end of the market in an eventual future because housing generally becomes less desirable as it ages.²²⁹ This argument functions only in a strict supply-demand vacuum. In reality, building new market-rate housing, which “typically is targeted at higher income households,”²³⁰ will result in the gentrification of neighborhoods and the subsequent displacement of lower-income residents.²³¹

222 Telephone Interview with Ombudsmen, Hous. Auth. of the City of L.A. (Nov. 11, 2016).

223 HACOLA stopped receiving applications in 2010. Palta, *supra* note 215.

224 *Fact Sheet*, Hous. AUTH. OF THE CITY OF L.A., http://revitalizersp.com/wp-content/uploads/2017/11/HACLA-Fact-Sheet_2015-07.20.16-FINAL.pdf.

225 *How to Apply*, Hous. AUTH. OF THE CTY. OF L.A., <http://www.hacola.org/public-housing/how-to-apply> (last visited May 6, 2018).

226 See ROMAN & TRAVIS, *supra* note 62, at 22 (“Some housing advocates have suggested that given an individual’s criminal history, it may not be feasible to expect that returning prisoners access this housing resource when thousands of law-abiding individuals are awaiting housing.”).

227 See MAC TAYLOR, CAL. LEGISLATIVE ANALYST’S OFFICE, PERSPECTIVES ON HELPING LOW-INCOME CALIFORNIANS AFFORD HOUSING 1 (2016), <http://www.lao.ca.gov/Reports/2016/3345/Low-Income-Housing-020816.pdf> (“facilitating more private housing development in the state’s coastal urban communities would help make housing more affordable for low-income Californians . . . [and e]xpanding affordable housing programs to help these households likely would be extremely challenging and prohibitively expensive.”).

228 See MIRIAM ZUK & KAREN CHAPPLE, UC BERKELEY, HOUSING PRODUCTION, FILTERING AND DISPLACEMENT: UNTANGLING THE RELATIONSHIPS (2016), http://www.urbandisplacement.org/sites/default/files/images/udp_research_brief_052316.pdf.

229 TAYLOR, *supra* note 227, at 7.

230 *Id.*

231 See generally MIRIAM ZUK ET AL., UC BERKELEY, GENTRIFICATION, DISPLACEMENT AND THE ROLE OF PUBLIC INVESTMENT 12 (2015), http://iurd.berkeley.edu/uploads/Displacement_Lit_Review_Final.pdf (“Gentrification, on the other hand, draws middle class residents to the city, attracted by job and recreational opportunities, low and appreciating housing prices, stabilization of negative social conditions (such as crime), and lifestyle or aesthetic considerations. . . . Displacement is the negative outcome of gentrification . . .”).

Additionally, existing landlords tend to support private market development and reinvestment, or “investments in a neighborhood [that result] in increased rent to a point where it’s profitable to sell or raise the rent and [existing] tenants are forced to leave.”²³² These reinvestment efforts convert once-affordable units into market-rate units, thereby actually exacerbating the affordable housing crisis. Thus, state support from the California Legislative Analyst’s Office for private market-rate housing is misguided and contributes to the exhaustion of affordable housing supply.

Because of the lobbying force of those who advocate for private market-rate housing development, funding for federally-subsidized housing—i.e. Section 8 and Public Housing—must compete with grant applications for revitalization projects or mixed-income developments.²³³ In 2014, out of the \$138.9 billion spent on housing, the federal government only allocated approximately \$41 billion as affordable housing funding to the states,²³⁴ of which California received approximately \$5 billion for its HUD-administered, federally subsidized affordable housing funds.²³⁵ As a result, federal budgets create chronic funding issues that prevent HACLA and HACOLA from meeting the current needs for affordable housing in the greater Los Angeles area.²³⁶ This is especially alarming given displacement research that indicates that federally-subsidized housing is twice as effective at reducing displacement of low-income residents at the regional level.²³⁷

However, in November 2016, Los Angeles passed Measure HHH into law, which would allow the City to create a \$1.2 billion bond—paid by property taxes averaging about \$33 a year—to pay for 10,000 units of affordable permanent supportive housing.²³⁸ Although the full implications for the Measure HHH are still uncertain, this additional funding source could help replenish some of the affordable housing stock with some benefit to reentering women.

Accessibility

Applicable Policy

The element of accessibility requires that state authorities eliminate the barriers that prevent formerly incarcerated women from accessing housing. For reentering individuals seeking housing, a criminal record almost always creates a barrier to accessing housing. Currently and formerly incarcerated women in Los Angeles have shared that public housing agencies, such as HACLA and HACOLA, and private landlords should not bar them solely on account

Currently and formerly incarcerated women in Los Angeles have shared that public housing agencies, such as HACLA and HACOLA, and private landlords should not bar them solely on account of their criminal histories.

232 *Id.* at 26.

233 See generally NATIONAL HOUSING LAW PROJECT ET AL., FALSE HOPE: A CRITICAL ASSESSMENT OF THE HOPE VI PUBLIC HOUSING REDEVELOPMENT PROGRAM (2002), <https://www.nhlp.org/files/FalseHOPE.pdf> (discussing how the HOPE VI program, which distributes redevelopment grants to revitalize or demolish public housing, exacerbated the affordable housing supply by reducing the amount of public housing units available). Ctr. on Budget & Policy Priorities, United States Fact Sheet: Federal Rental Assistance, <http://www.cbpp.org/sites/default/files/atoms/files/4-13-11hous-US.pdf>.

234 Ctr. on Budget & Policy Priorities, *United States Fact Sheet: Federal Rental Assistance*, <http://www.cbpp.org/sites/default/files/atoms/files/4-13-11hous-US.pdf>.

235 Ctr. on Budget & Policy Priorities, *California Fact Sheet: Federal Rental Assistance*, <https://www.cbpp.org/sites/default/files/atoms/files/4-13-11hous-CA.pdf>.

236 See WILL FISCHER AND BARBARA SARD, *Chart Book: Federal Housing Spending Is Poorly Matched to Need*, CTR. OF BUDGET & POLICY PRIORITIES (Nov. 4, 2016), <http://www.cbpp.org/research/housing/chart-book-federal-housing-spending-is-poorly-matched-to-need> (noting that nearly 60 percent of the overall federal housing spending benefitted households with incomes greater than \$100,000, which indicates that higher-income households receive a larger share of the federal spending even though lower-income households are more likely to struggle to afford their housing).

237 ZUK ET AL., *supra* note 231.

238 Yes on HHH, *Fact Sheet*, <http://westsidecouncils.com/wp-content/uploads/2016/02/Yes-on-HHH-Fact-Sheet.pdf>.

The Guidance Note also mandates that the housing provider carry the burden of proving that the discriminatory effect caused by the policy or practice is justified.

of their criminal histories. As addressed above, initiatives and new programming by public housing agencies have attempted to mitigate the effect that a criminal record has on a family’s housing tenure, such as allowing participation in federal housing programs which promote family reunification. However, because HUD regulations still bar individuals with certain types of convictions from participating, some formerly incarcerated individuals are excluded from the public affordable housing market.

To address barriers to accessing housing in the public and private markets alike, HUD released a Guidance Note from its general counsel to address situations “in which a housing provider justifies an adverse housing action – such as a refusal to rent or renew a lease – based on an individual’s criminal history.”²³⁹ By connecting the impact of a criminal record to the definition of discrimination as stated in the Fair Housing Act (hereinafter referred to as the “FHA”),²⁴⁰ the Guidance Note suggests that “[w]hile having a criminal record is not a protected characteristic under the Fair Housing Act,”²⁴¹ using a prospective resident’s criminal history to make housing decisions may still be a violation of the FHA.

The Guidance Note concludes that there are widespread racial and ethnic disparities in the criminal justice system and notes that African-Americans and Hispanics are arrested, convicted, and incarcerated at disproportionate rates.²⁴² Given this disparity, barriers to housing based on criminal history may violate the FHA if (1) “without justification, their burden falls more often on renters or other housing market participants of one race or national origin over another” or (2) “if a housing provider treats individuals with comparable criminal history differently because of their race, national origin or other protected characteristic.”²⁴³

In effect, the Guidance Note requires that inquiry into a prospective tenant’s criminal history serve the housing provider’s substantial, legitimate, and nondiscriminatory interest, and that related policies consider factors such as type of crime and length of time since the conviction.²⁴⁴ The Guidance Note also mandates that the housing provider carry the burden of proving that the discriminatory effect caused by the policy or practice is justified. The Guidance Note condemns arbitrary and overbroad bans related to history—e.g., a policy or practice that denies housing to anyone with a prior arrest or *any* criminal conviction—as an example of a policy that likely lacks a legally sufficient justification.²⁴⁵ Thus, the Guidance Note is an indispensable policy tool to overcome the barriers to access.

239 U.S. DEP’T OF HOUS. & URBAN DEV., OFFICE OF GENERAL COUNSEL GUIDANCE ON APPLICATION OF FAIR HOUSING ACT STANDARDS TO THE USE OF CRIMINAL RECORDS BY PROVIDERS OF HOUSING AND REAL ESTATE-RELATED TRANSACTIONS (2016), http://portal.hud.gov/hudportal/documents/huddoc?id=HUD_OGCGuidAppFHASStandCR.pdf.

240 42 U.S.C. §§ 3601–3616 (prohibiting the discrimination in the sale, rental, or financing of housing against “any person because of race, color, religion, sex, familial status, or national origin”).

241 U.S. DEP’T OF HOUS. & URBAN DEV., *supra* note 239, at 2.

242 *Id.* at 3–4.

243 *Id.* at 2.

244 *Id.* at 10.

245 *Id.*

REALITY—LANDLORDS AND OTHER HOUSING PROVIDERS DISCRIMINATE AGAINST REENTERING WOMEN; AND FAMILY REUNIFICATION CHALLENGES ALSO PREVENT HOUSING ACCESSIBILITY. EXISTING POLICY DOES LITTLE TO HELP

“Are people okay with formerly incarcerated people serving them their burgers, but not living next door to them?”²⁴⁶

While the Guidance Note may potentially reduce the discriminatory barriers to housing, few may be aware of its existence because it is only accessible through the HUD website. Furthermore, its legal conclusions are difficult for formerly incarcerated potential renters, private landlords, and developers to understand. It is difficult for formerly incarcerated potential renters to use or trust information that is steeped in legalese.

Secondly, the Guidance Note offers no meaningful avenue for the enforcement of its standards. This is a serious problem given that a fundamental barrier that reentering women face in accessing housing is the unwillingness of landlords, housing providers, and community residents to allow formerly incarcerated persons to return to their communities.²⁴⁷ Much of this opposition is driven by the intense stigma society attaches to people with criminal records. Some of these oppositionists are “Not in My Backyard” (“NIMBY”) proponents who fear that the reunification and integration of formerly incarcerated individuals into a neighborhood will lower property values, threaten public safety, and adversely affect neighborhood amenities.²⁴⁸ Other opposing forces hail from low-income communities who fear that integration and reunification of formerly incarcerated individuals will jeopardize community safety.

Additionally, although California law has created the obligation to promote nondiscrimination in the provision of housing, the current iteration of the law does not adequately address the discrimination that reentering individuals face when looking for housing.²⁴⁹ In February of 2015, Assemblymember Jones-Sawyer introduced Assembly Bill 396 (AB-396) to add a “fair chance” housing provision to Section 12955.05 that would prohibit rental housing owners from inquiring about or requiring a housing applicant to disclose a criminal record during the initial application and assessment phase.²⁵⁰ Unfortunately, AB-396 died on January 31, 2016 due to significant resistance by private landlords, housing providers, and their lobbyists. Thus, in its present form and without the aid of “fair chance” housing legislation, the Guidance Note cannot fully dismantle the barriers that keep formerly incarcerated women from access to housing.

The CIW Think Tank’s Community Partners and other CBOs that conduct expungement services have helped address the accessibility gap that has resulted from poor implementation of the April 2015 HUD Guidance and from robust landlord resistance. ANWOL, a community partner, and Neighborhood Legal Services of Los Angeles County and the Legal Aid Foundation of Los Angeles, both CBOs, assist with expungement services to either expunge or reduce convictions from one’s law enforcement record. Expungement services help eliminate the discriminatory effect and stigma that a criminal record presents in the housing search. Yet, according to formerly incarcerated women, there is a greater need for expungement services than what is currently available.²⁵¹ The City of Los Angeles must work to provide more expungement clinics and partner with organizations that offer such services.

“Women with children to support have an even tougher time [because] the first thing they want to do is get their kids back and provide for them.”²⁵²

246 Consultation with CIW Think Tank in Chino, Cal. (Oct. 28, 2016).

247 Hous. Auth. of the City of L.A. Interview, *supra* note 222; Interview with Kimberley Guillemet, Manager, L.A. Mayor’s Office of Reentry, in L.A., Cal. (Oct. 17, 2016).

248 See JOHN JAY COLL. OF CRIMINAL JUSTICE & THE FORTUNE SOC’Y, IN OUR BACKYARD 5, http://johnjay.jjay.cuny.edu/files/TOOL_KIT_1-NIMBY_FINAL.pdf.

249 See CAL. GOV’T CODE § 12955 (prohibiting discrimination only on the basis of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, or genetic information).

250 A.B. 396, 2015 Assemb., Reg. Sess. (Cal. 2015).

251 Focus Group Interview with Jamie Galang, Elaine Espinoza, and Michele Payne, *supra* note 151.

252 Consultation with CIW Think Tank Member Meme, in Chino, Cal. (Nov. 30, 2016).

Another distinct barrier to accessing housing for many formerly incarcerated women surfaces when they seek to reunite with their children. An estimated seven of ten incarcerated women have minor children: approximately “72 percent of women on probation . . . 65 percent of women in state prisons, and 59 percent of women in federal prisons have young children.”²⁵³ Many reentering women must find a home for themselves and for their children; moreover, these reentering women have special reentry needs such as unaddressed prior trauma as well as the trauma of incarceration and the trauma induced by separation from their children.²⁵⁴ Because of the scarcity of affordable housing stock and barriers to the housing market, organizational housing resources present a more practicable option. Yet, as discussed *infra* under the analysis of cultural adequacy, only the FOTEP and limited resources of CBOs allow formerly incarcerated women to stay with their children while receiving wraparound services and treatment. As a result, women are often forced to choose between accessing housing that would facilitate their successful reentry and achieving family reunification.

However, the underlying problem for women returning to Los Angeles is that there are too few beds and homes for formerly incarcerated women. Formerly incarcerated women cannot access what does not exist. ANWOL Associate Director Tiffany Johnson, a woman formerly incarcerated at CIW, has shared that community-based organizations’ reentry spaces for women “are few and far between,” with existing spaces requiring additional qualifications such as a diagnosis with a medical condition or a history of substance abuse.²⁵⁵ For example, Walden House—now part of HealthRIGHT360—a facility in El Monte, California, assists clients with substance abuse disorder and mental health issues.²⁵⁶ Although this type of reentry organizations is certainly commendable and necessary, not every reentering woman has a qualifying diagnosis. Johnson argues that a diagnosis qualification is “another way of pushing you out. . . another way of labeling you.”²⁵⁷ As a result, these additional requirements create yet another barrier for formerly incarcerated women in their housing searches.

Location

Applicable Policy

The location element requires that state authorities locate housing near resources that help meet reentering women’s basic needs, away from places where they will face peer and economic pressure to reoffend, and away from any settings where a reentering woman may face triggers relating to substance abuse or mental health issues.

As a provider of limited affordable housing, HACLA has advocated for the creation of “viable, healthy communities” and Public Housing developments located throughout the City of Los Angeles within close proximity to transit lines so to “empower able residents to achieve financial independence.”²⁵⁸ Additionally, as discussed above, HACLA standards also aim to build communities free of criminal activity.

253 ROMAN & TRAVIS, *supra* note 27, at 10.

254 *Id.*

255 Interview with Tiffany Johnson, *supra* note 39.

256 HealthRIGHT360, *Walden House*, <http://www.healthright360.org/agency/walden-house> (last visited May 4, 2018).

257 Interview with Tiffany Johnson, *supra* note 39.

258 Hous. Auth. of the City of L.A., *About Us*, <http://home.hacla.org/aboutus> (last visited Nov. 11, 2018).

REALITY—PUBLIC HOUSING IS LOCATED IN AREAS WITH POOR HEALTH AND SAFETY, AND PAROLE RESTRICTIONS CONFINE REENTERING WOMEN TO LOCATIONS THAT INCREASE THE RISK OF RECIDIVISM

“They are forcing me to go back to XXXX County unless I go into transitional housing”²⁵⁹

Despite HACLA’s claims of healthy and viable communities located near transit to achieve individual empowerment, Public Housing in Los Angeles is in disarray and state authorities are not meeting the standards that the location element requires. For example, in Jordan Downs, a HACLA Public Housing community that sits adjacent to a disused factory site in Watts, Los Angeles, residents are plagued by multiple health hazards, including lead contamination.²⁶⁰ Previous Los Angeles Mayor Villaraigosa confirmed that Watts has the lowest life expectancy of all California neighborhoods.²⁶¹ Given that public housing is located near immediate threats to health and safety, which are unequivocally basic human needs, the location of public housing units directly undermines the realization of the right to housing.

“[A]ddressing the barriers has to do with the laws . . . the laws are not operating the way people intended when they voted them in”²⁶²

Moreover, California’s laws on release and parole conditions further implicate the location element and preclude reentering women from living in housing that is located near useful resources. For example, current California law requires that parolees be returned to the same county of the parolee’s last legal residence prior to his or her incarceration.²⁶³ Exceptions to this rule occur very sparingly—only upon application for transfer and subsequent individual review may a parolee be released to another county “if that would be in the best interest of the public.”²⁶⁴ Currently incarcerated women have shared that this law often sends a reentering person back to the same community in which she was arrested and convicted,²⁶⁵ thereby subjecting her to many of the same peer and economic pressures to reoffend. Thus, in effect, parole laws may even contribute to recidivism. A CIW Think Tank member shared that the many challenges that confront women returning to their communities, including having “nowhere to live, no money from the county because of drug convictions, no prospect of a job . . . [add] up to a rapid return to what [the returning woman] know[s]: selling drugs and making money”²⁶⁶—i.e., turning to past behaviors that contributed to the initial offense.

Further, consultations with currently and formerly incarcerated women reveal that in practice, obtaining approval for a post-release location transfer is nearly impossible due to the huge backlog of applications.²⁶⁷ Because of the volume of the backlog, many transfer requests get lost in the shuffle and the only real way to avoid being released into a location that the parolee deems unsafe or impracticable is to request placement in transitional “halfway house type” housing.²⁶⁸ Halfway houses are residential programs that function as a “halfway” step between prison and the community. Halfway houses focus on helping incarcerated individuals transition from prison and into their communities.²⁶⁹ The CCTRP, discussed *infra* in the cultural adequacy analysis, is one example of such housing.

259 Consultation with CIW Think Tank, *supra* note 110.

260 Bianca Barragan, *Huge Jordan Downs Redevelopment Sits on a Very Toxic Site*, CURBED L.A. (Dec. 26, 2013), <http://la.curbed.com/2013/12/26/10160696/huge-jordan-downs-redevelopment-sits-on-a-very-toxic-site>.

261 Adrian Glick Kudler, *Watts Residents Will Die 11.9 Years Before Bel Air Residents*, CURBED L.A. (Jul. 8, 2013), <http://la.curbed.com/2013/7/8/10222942/watts-residents-will-die-11-9-years-before-bel-air-residents>.

262 See Interview with Jamie, Elaine, and Michelle, *supra* note 148.

263 Cal. Dep’t of Corr. & Rehab., *Sentencing, Incarceration, & Parole of Offenders*, http://www.cdcr.ca.gov/victim_services/sentencing.html (last visited May 4, 2018).

264 *Id.*

265 Consultation with CIW Think Tank, *supra* note 110.

266 Consultation with CIW Think Tank Member Meme, *supra* note 218.

267 Consultation with CIW Think Tank, *supra* note 110; Interview with Jamie, Elaine, and Michelle, *supra* note 151.

268 Consultation with CIW Think Tank, *supra* note 110.

269 See generally, ROMAN & TRAVIS, *supra* note 27, at 14–18, for a discussion on halfway houses.

Another example of an onerous parole law is the requirement that parolees receive approval by their parole agents to travel more than 50 miles from their residence.²⁷⁰ This restriction is impractical given that pervasive barriers to housing may result in a formerly incarcerated person living far away from vital resources and employment.

These restrictive laws directly compromise reentering women’s right to housing by severely restricting the location of where formerly incarcerated women are able to live. Thus, Los Angeles must work with the State to change the laws governing release and parole.

Cultural Adequacy

Applicable Policy

The element of cultural adequacy requires that housing policies aspire create strong, pluralistic, and healed communities. As addressed above in the analysis of the security of tenure element, HACLA’s Section 8 Pilot Reentry Program is an innovative resource in Los Angeles that attempts to realize this element. As above, the HACLA Pilot Reentry Program requires participating families to engage in supportive reentry services, which allow families to adjust to the return of a formerly incarcerated family member. The supportive services requirement strives to provide housing that is culturally appropriate for both the family and the reentering family member; yet, the reality discussed below uncovers many shortcomings behind its design.

Additionally, CDCR also provides limited state-run resources that aim to provide culturally adequate forms of housing. One significant CDCR resource is the CCTRP, a “halfway house,” which allows currently-incarcerated persons who are eligible for the program to serve the final two years of their sentences in a CCTRP facility that is located outside in the community rather than in prison.²⁷¹ The CCTRP provides participants with rehabilitative services including support with alcohol and drug recovery, the employment search, educational pursuits, acquiring housing, family reunification, and counseling.²⁷² In lieu of incarceration, participants wear an ankle monitor and may work in the community before release. This allows participants to slowly reenter and better acclimate to society. According to a group of formerly incarcerated women who have participated in CCTRP, the program is critical for reentry success because the program offers its participants far more resources than what is offered in prison.²⁷³ One formerly incarcerated woman shared that the program offered her \$100 each month, helped her acquire

The CCTRP provides participants with rehabilitative services including support with alcohol and drug recovery, the employment search, educational pursuits, acquiring housing, family reunification, and counseling.

270 Cal. Dep’t of Corr. & Rehab., *supra* note 263.

271 Cal. Dep’t of Corr. & Rehab., *Custody to Community Transitional Reentry Program*, http://www.cdcr.ca.gov/Adult_Operations/FOPS/Custody_to_Community_Transitional_Reentry_Program.html (last visited May 4, 2018).

272 *Id.*

273 Interview with Jamie, Elaine, and Michelle, *supra* note 151.

clothing for a job interview, and assisted with her resume preparation.²⁷⁴ This is in stark contrast with what is available to parolees upon release: a meager \$200.²⁷⁵

Another CDCR resource is the FOTEP, which was designed to reduce recidivism by providing holistic services to each program participant.²⁷⁶ Although the length of the program has a maximum of 15 months, the treatment plan is specialized for each woman “to address her health, emotional, educational, vocational, family and legal concerns alongside her substance abuse, mental health, and behavioral issues.”²⁷⁷ Through this program and its intensive, gender-responsive and trauma-informed approach, participants can smoothly transition from custody to the community.²⁷⁸ One critical and unique aspect of FOTEP is that it allows children to reside with women participants throughout their treatment and recovery period.²⁷⁹ Therefore, the wraparound services of both CDCR programs do work towards providing culturally adequate housing resources aimed at addressing individual women’s needs and situations.

One critical and unique aspect of FOTEP is that it allows children to reside with women participants throughout their treatment and recovery period.

274 *Id.*

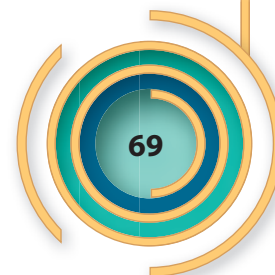
275 CAL. PENAL CODE § 2713.1 (West 2016); CAL. CODE REGS. tit. 15, § 3075.2(d) (2016). *But see* KATE J. WILSON, CTR. FOR PUB. POLICY RESEARCH, UC DAVIS, STATE POLICIES AND PROCEDURES REGARDING “GATE MONEY” (2007), http://www.cdcr.ca.gov/adult_research_branch/research_documents/gate_money_oct_2007.pdf (explaining that this \$200 sum, often referred to as “gate money,” is typically distributed in installments, with parolees receiving \$50 to \$100 of the total at their first parole officer meeting).

276 Cal. Dep’t of Corr. & Rehab., *Female Offender Treatment and Employment Program (FOTEP)*, <http://www.cdcr.ca.gov/rehabilitation/FOTEP.html> (last visited May 4, 2018).

277 HealthRIGHT360, *Female Offender Treatment and Education Program (FOTEP)*, <https://www.healthright360.org/program/female-offender-treatment-and-education-program-fotep> (last visited May 4, 2018).

278 Cal. Dep’t of Corr. & Rehab., *supra* note 276.

279 *Id.*



REALITY—THERE IS INSUFFICIENT SUPPORT FOR PLURALISTIC, WHOLE COMMUNITIES FOR REENTERING WOMEN IN LOS ANGELES

“Agencies represent forms, paperwork, and penalties.”²⁸⁰

As discussed earlier, the reality of the Section 8 Pilot Reentry Program indicates that many families do not complete their participation requirements because they are either unwilling to reunite with their formerly incarcerated family members or unable to complete the full year requirement of supportive services. Consultations with currently incarcerated women indicate that the family participation issue is the result of agency-led or the perception of agency-led solutions and the dearth of trauma-informed care for communities on the outside.²⁸¹

Families on the outside need mental health support. This means that families must have conversations about the tensions that exist because of a family member’s incarceration experience and engage in activities that help rebuild the relationship between the reentering individual and her family.²⁸² Additionally, facilitation of these conversations must be led by other families who have already successfully reunited with their formerly incarcerated family members.²⁸³ Increased efforts to promote “family-to-family” mentorship would mitigate the appearance of an agency-led solution and allow for peer-led restoration and healing.

Further, as the Pilot Reentry Program currently operates, support services for the family start after the reentering family member is released and subsequently accepted into the Pilot Reentry Program—which is too late. A culturally adequate provision would allow for this type of support to start far earlier, i.e., while the reentering family member is still incarcerated. This change would alleviate some of the tensions that immediately arise upon family reunification and allow for the “receiving” family to adequately prepare for the incarcerated family member’s return.

In comparison, both CCTRP and FOTEP, due to their provision of wraparound services and emphasis on rehabilitation, certainly provide culturally adequate forms of housing. However, space in CCTRP is extremely limited.²⁸⁴ Moreover, CCTRP experiences chronic budget problems that exacerbate staffing and resource issues. Eligibility for CCTRP is also stringent.²⁸⁵ Similarly, the reality of FOTEP reveals that program participation is highly limited and even discretionary. FOTEP is only available to parolees under the jurisdiction of the Division of Adult Parole Operations who have an identified Correctional Offender Management Profiling for Alternative Sanctions (“COMPAS”) need, i.e., a criminogenic need.²⁸⁶ In addition to the eligibility requirement of a criminogenic need, FOTEP enrollment is limited to those given a referral by their Agent of Record.²⁸⁷ As such, not all reentering women qualify for the program, and many formerly incarcerated women do not get to benefit from these highly effective and culturally appropriate resources.

280 Consultation with CIW Think Tank, *supra* note 110.

281 *Id.*

282 *Id.*

283 *Id.*

284 One CIW Think Tank member reported that her convicted offense precluded participation in CCTRP and other transitional housing programs. *Id.* For example, crimes that are deemed violent crimes preclude participation in CCTRP. Interview with Jamie, Elaine, and Michelle, *supra* note 151.

285 Interview with Jamie, Elaine, and Michelle, *supra* note 151.

286 A criminogenic need is a dynamic factor that, if changed or addressed, may reduce the risk of recidivism. See JENNIFER L. SKEEM & JENNIFER ENO LOUDEN, CAL. DEP’T OF CORR. & REHAB., ASSESSMENT OF EVIDENCE ON THE QUALITY OF THE CORRECTIONAL OFFENDER MANAGEMENT PROFILING FOR ALTERNATIVE SANCTIONS (COMPAS) 7, http://www.cdcr.ca.gov/adult_research_branch/Research_Documents/COMPAS_Skeem_EnoLouden_Dec_2007.pdf. COMPAS is a tool for assessing one’s risk, or likelihood, of future reoffending, and as with the FOTEP, the COMPAS assesses criminogenic needs to determine whether the offender should be placed in specific programs. *Id.*

287 Cal. Dep’t of Corr. & Rehab., *supra* note 276.

In order to mitigate the gaps in the cultural adequacy element as well as gaps in accessibility and location, CPs and CBOs provide additional culturally adequate and trauma-informed options. For example, ANWOL provides temporary housing for reentering women as well as other services that help build independence and confidence for reentry,²⁸⁸ and SHIELDS for Families provides temporary and transitional housing through their Tamar Village program, which is designed for reentering women with children involved with child protective services.²⁸⁹ Despite these resources, there are still insufficient housing facilities in Los Angeles that aim to build pluralistic, healed, and whole communities. In order to meet this standard, Los Angeles must support programming that creates and expands available reentry housing services for formerly incarcerated women; and these services must be tailored to the particular cultural needs of formerly incarcerated women.

B. EMPLOYMENT: POLICY VERSUS REALITY

Applying the elements outlined in Section II, this Section lays out the employment resources currently available in the City of Los Angeles, evaluates their accessibility, and identifies additional resources necessary to increase the likelihood of successful reentry for returning women. The scope of this Section of the Report is defined by employment priorities as articulated by the CIW Think Tank. Although problems with the acceptability and quality of employment exist,²⁹⁰ the most salient issues for formerly incarcerated women relate to the circumstances present before acquiring a job, mainly implicating the elements of availability and accessibility.

Availability

Availability refers to the existence of specialized services that help prepare individuals for the job search and application processes, including case management programs, vocational training, and arts courses.²⁹¹ In the Los Angeles reentry landscape, there is a lack on both ends of the availability formula: lack of job readiness (and retention) on the part of the individual, and lack of job opportunities for formerly incarcerated people, particularly women.

Applicable Policy: Job Readiness and Job Retention

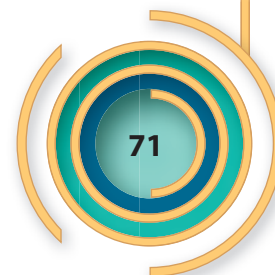
In order to work towards meaningfully reducing recidivism, institutional programs that help prepare individuals meet their basic needs upon reentry are essential. Programs that help build not only technical skills, but also soft skills are vital. Currently, work programs such as those established through CALPIA provide technical skills training. At CIW, CALPIA offers programs in the fabric production, construction services, and facilities maintenance

288 See A New Way of Life, Re-entry Housing, <http://www.anewwayoflife.org/re-entry-housing/> (last visited May 4, 2018).

289 See Shields for Families, Substance Abuse Treatment, <https://www.shieldsforfamilies.org/substance-abuse/> (last visited May 4, 2018).

290 As mentioned *supra* Section II, acceptability and quality refer to the right to freely choose type of work, right to social security, and good working conditions. These are mainly governed by local, state, and federal employment laws, where employer violations may be remedied by filing claims and lawsuits.

291 See *supra* Section II.



enterprises.²⁹² Graduates of CALPIA’s Construction Laborer and Carpentry program “meet all the criteria to join a construction union when released, which drastically improves the chances of rapidly securing gainful employment.”²⁹³ Additionally, CALPIA’s website claims to reduce recidivism through investing in the curricula of their participants, stating that they “offer nationally recognized accredited certification such as dental technology, food handling, laundry, agriculture, welding, metal stamping, industrial safety and health, electrical systems, mechanical systems and maintenance.”²⁹⁴ CDCR itself also provides technical training similar to that of CALPIA in areas such as building maintenance, office services, and cosmetology.²⁹⁵ The Canine Support Teams Prison Puppy Program offers volunteers vocational preparation in dog training skills, which many women take with them to secure employment as dog trainers after release.²⁹⁶

Training to build soft skills is equally important as it provides individuals with the cognitive ability and critical thinking skills necessary for a variety of jobs.²⁹⁷ Arts courses and higher education opportunities can offer this training.²⁹⁸ At CIW, Occidental College currently offers art classes; The Actors’ Gang hosts a theater workshop through its Prison Project; Cal State San Bernardino offers community-based art courses; and non-profits provide art classes such as painting.²⁹⁹ According to Ella Turenne, arts programs are particularly powerful for women in the justice system because women often allow themselves to be open and vulnerable in their connection to art.³⁰⁰ Representatives of The Actors’ Gang advocated that theater activities help justice-involved individuals build trust, familiarize themselves with a variety of emotions, and

292 CAL. PRISON INDUSTRY AUTHORITY, 2016–21 STRATEGIC BUSINESS PLAN, <https://www.calpia.ca.gov/about/2016-2021-calpia-strategic-business-plan/2016-strategic-business-plan/>.

293 Consultation with CIW Think Tank Member Paige Linville, in Chino, Cal. (Nov. 30, 2016).

294 *About CALPIA*, CALIFORNIA PRISON INDUSTRY AUTHORITY, <https://www.calpia.ca.gov/about/> (May 4, 2018).

295 Consultation with CIW Think Tank, *supra* note 110.

296 Consultation with CIW Think Tank Member Paige Linville, *supra* note 293.

297 Skype Interview with Ella Turenne, Assistant Dean for Community Engagement, Occidental College (Oct. 26, 2016).

298 Larry Brewster, *The Impact of Prison Arts Programs on Inmate Attitudes and Behavior: A Quantitative Evaluation*, 11 JUSTICE POLICY JOURNAL 1, 2 (Fall 2014), http://www.cjcg.org/uploads/cjcg/documents/brewster_prison_arts_final_formatted.pdf, (concluding that “arts education can lead to improved writing skills, greater intellectual agility and creativity, motivation, and enhanced performance in other academic disciplines”); Halle Tecco, *Prison Programs Take Innovative Approach to Reducing Recidivism*, HUFFINGTON POST: THE BLOG (updated Nov. 17, 2011), http://www.huffingtonpost.com/halle-tecco/prison-programs-take-inno_b_326020.html (stating that through theater, “the use of dramatic techniques leads to significant improvements in the cognitive behavior of the program’s participants inside prison and a reduction in recidivism once paroled,” and also “[b]eing able to express their emotions through art or writing gives [incarcerated individuals] hope for the future, as well as some release from frustration, lack of self-worth and hopelessness”).

299 Consultation with CIW Think Tank Member Jennifer, at Chino, Cal. (Dec. 2, 2016).

300 Ms. Turenne further qualifies this by explaining that in men’s prisons, men are conditioned by the system to be the least vulnerable as a matter of survival. Skype Interview with Ella Turenne, *supra* note 297.

break down barriers in ways that are otherwise impossible in the context of incarceration.³⁰¹ These benefits not only serve as means of healing, but provide participants with tools such as communication skills, which can assist with reentry and promote job retention.³⁰² Art and theater programs “allow people to get in touch with the person they were before they got involved in the criminality.”³⁰³ They also build character. As one CIW Think Tank member shared: “I learned to have patience with myself, not to rush things but to simply take [life] one brushstroke at a time. . . . I learned self-acceptance. I put my heart and hard work into something and was finally able to be proud of it, of myself.”³⁰⁴

In addition to arts programming, diverse higher education opportunities are also available to reentering women. California Governor Jerry Brown signed a bill in 2014 amending open access laws to allow community colleges to receive funding for in-person courses taught in prisons and jails,³⁰⁵ which led to a shift away from reliance on distance education programs.³⁰⁶ Except Chaffey, all courses offered at CIW by colleges communicate solely by writing.³⁰⁷ While CDCR staff proctor exams, women complete the remainder of the courses independently.³⁰⁸ California state legislation established an 18-month pilot collaboration with community colleges to offer college courses in prisons that began Fall 2015, which CIW is one of four participating institutions.³⁰⁹ Although Chaffey College has offered its Turning Point Program at CIW for eleven years, it only recently began offering in-person courses.³¹⁰ The Turning Point Program includes courses towards an associate degree, certificate programs, career technical education, and ESL courses.³¹¹ Chaffey’s associate degree program is limited to a degree in business in order to be as inclusive as possible, taking into consideration the limitations some convictions place on employment and career opportunities.³¹²

California Governor Jerry Brown signed a bill in 2014 amending open access laws to allow community colleges to receive funding for in-person courses taught in prisons and jails, which led to a shift away from reliance on distance education programs.

301 Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174; *accord* Consultation with CIW Think Tank, *supra* note 110 (“This is not an acting class nor is it therapy. Instead, it is the process of using stock characters from the Commedia dell’Arte to explore and identify the emotional status of sadness, anger, fear, and happiness. These emotions are often recognizable to a woman in her day-to-day life, yet, as she explores her character’s emotions, these statuses become accessible in choice-making and self-awareness.”).

302 Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174.

303 *Id.*; *accord* Consultation with CIW Think Tank, *supra* note 110 (regarding the Actors’ Gang Prison Project, the author writes, “Women speak of the freedom they begin to feel and comment on their growing sense of comfort in discover who they are.”).

304 Consultation with CIW Think Tank Member Jennifer, *supra* note 299.

305 S.B. 1391, Chapter 695 (Cal. 2014), http://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201320140SB1391#. In-person courses in prisons and jails violated open access laws prior to the amendment as courses inside institutions would not be open to the general student population.

306 Skype Interview with Laura M. Alvarado, CIW Coordinator, Chaffey College (Nov. 17, 2016).

307 Consultation with CIW Think Tank, *supra* note 110.

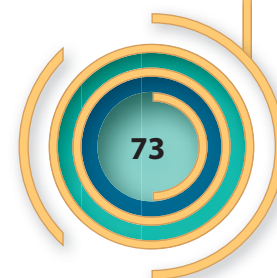
308 *Id.*

309 Rivera, *supra* note 38.

310 Skype Interview with Laura M. Alvarado, *supra* note 306.

311 *Id.*

312 *Id.*



Some organizations provide further soft skills training geared towards employment.

Resources available after reentry are necessary to facilitate a smoother transitional period during parole. The State of California, the City of Los Angeles, and non-profits located in Los Angeles provide a wide variety of employment resources. In terms of job training, the State has a California Training Benefits program through the Employment Development Department³¹³ the Mayor’s Office of Reentry established a partnership with the California Department of Transportation (“Caltrans”),³¹⁴ the Los Angeles Workforce Development Board provides training through the LA:RISE,³¹⁵ and there is a federally funded collaborative effort between local and state entities called WorkSource California.³¹⁶ Some organizations provide further soft skills training geared towards employment—resume building, cover letter writing, and mock interviews. Among these are ANWOL,³¹⁷ the Anti-Recidivism Coalition,³¹⁸ InsideOUT Writers,³¹⁹ LA:RISE,³²⁰ and WorkSource Centers.³²¹ ANWOL,³²² ARC,³²³ and InsideOUT Writers³²⁴ also have Dress for Success assistance, providing clothes and haircuts for individuals who have upcoming interviews. Mentorship programs such as those offered through ARC³²⁵ and InsideOUT Writers³²⁶ are invaluable as they provide guidance with navigating the network of resources.

313 *California Training Benefits (CTB)*, STATE OF CAL. EMP’T DEV. DEP’T, http://www.edd.ca.gov/unemployment/California_Training_Benefits.htm (last visited May 4, 2018).

314 Interview with Kimberley Guillemet, *supra* note 247.

315 *LA:RISE*, L.A. ECON. & WORKFORCE DEV. DEP’T, <http://ewddlacity.com/index.php/employment-services/la-rise> (last visited May 4, 2018).

316 ECON. & WORKFORCE DEV. DEP’T, <http://ewddlacity.com/index.php/employment-services/adults-age-24-and-older/worksource-centers> (last visited May 4, 2018).

317 Interview with Tiffany Johnson, *supra* note 39.

318 Skype interview with Sam Lewis, *supra* note 174.

319 Interview with Jimmy Wu, Alumni Advocacy Director, InsideOUT Writers, in L.A., Cal. (Oct. 26, 2016).

320 *LA:RISE*, *supra* note 315.

321 ECON. & WORKFORCE DEV. DEP’T, *supra* note 316.

322 Interview with Tiffany Johnson, *supra* note 39.

323 Skype interview with Sam Lewis, *supra* note 174.

324 Interview with Jimmy Wu, *supra* note 319.

325 Skype interview with Sam Lewis, *supra* note 174.

326 Interview with Jimmy Wu, *supra* note 319.

REALITY—TRAUMA AND OTHER EDUCATIONAL BARRIERS PREVENT WOMEN FROM BENEFITTING FROM WHAT FEW JOB READINESS PROGRAMS EXIST, AND THOSE THAT DO HAVE NO GUARANTEE OF EMPLOYMENT UPON REENTRY. ACCESS TO INFORMATION ON REENTRY EMPLOYMENT RESOURCES IS LIMITED AND EXISTING POLICIES CONTRIBUTE TO DIMINISHING ACCESS TO THIS INFORMATION

“Reform is necessary so that women born with three strikes against them at birth can be given an opportunity through intervention, mentorship, and vocational training to change the course of their lives and become contributing citizens to the L.A. area.”³²⁷

Technical Skills Training

According to the hiring standards of CALPIA, the ability to read, write, and communicate effectively factors into the hiring process for most positions.³²⁸ At the same time, a 2007 report from the National Assessment of Adult Literacy states that roughly about three-fifths of incarcerated people did not have a high school diploma or an equivalent certificate before they were incarcerated.³²⁹ For those who do not have either a diploma or a certificate but have a CALPIA placement, the program requires workers to attain either the diploma or equivalent certificate within two years of the assignment.³³⁰ Although this may serve as motivation to participate in the educational programs offered within carceral institutions, many incarcerated women have past experiences and trauma that negatively affect their ability to learn,³³¹ vastly limiting the number of reentering women that can benefit from CALPIA.

“While these programs each offer a certification, the majority of them do not guarantee employment.”³³²

Furthermore, the employment problem is exacerbated by the fact that many private employers that partner with CALPIA through the Joint Venture Program³³³ are not willing to hire women workers within the program after they have paroled.³³⁴ Even women who attain certification from career technical education courses have no guaranteed employment upon graduation and parole.³³⁵

Soft Skills Training and Prison Education Programs

“I had to make a different ending for my story. My strategy to make that happen was education.”³³⁶

327 Consultation with CIW Think Tank Member Leslie, *supra* note 17.

328 CAL. CODE REGS. tit. 15, § 8004.1 (2013).

329 ELIZABETH GREENBERG ET AL., NAT’L CTR. FOR EDUC. STAT., LITERACY BEHIND BARS: RESULTS FROM THE 2003 NATIONAL ASSESSMENT OF ADULT LITERACY PRISON SURVEY VI (2007), http://nces.ed.gov/pubs2007/2007473_1.pdf.

330 CAL. CODE REGS. tit. 15, § 8004.1 (2013).

331 See *infra* discussion on reality of soft skills training.

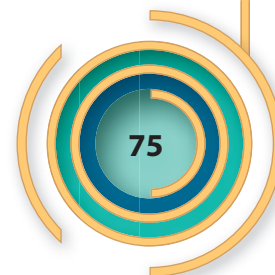
332 Consultation with CIW Think Tank Member Paige Linville, *supra* note 259.

333 See JOINT VENTURE PROGRAM, CALPIA, <https://cbig.ca.gov/Government-Partners/CALPIA-Joint-Venture-Program> (last visited May 5, 2018).

334 See *infra* discussion on lack of job opportunities.

335 Consultation with CIW Think Tank Member Paige Linville, *supra* note 293.

336 Consultation with CIW Think Tank Member Meme, *supra* note 252.



Although resistance from officers towards art courses remains, receptivity is shifting due to the tangible changes seen in participants.³³⁷ However, art courses offered through distance education lack the programmatic support necessary for students to fully reap the benefits.³³⁸ Additionally, individuals who wish to continue attending The Actors’ Gang’s theater courses after reentry may be prohibited from doing so by parole officers.³³⁹

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Moreover, education programs within prisons still largely run ineffectively. Despite amendments to California’s open access laws,³⁴⁰ change has been slow³⁴¹ and a large portion of courses offered in prisons remain distance courses.³⁴² Correspondence courses and Chaffey’s in-person programs face further obstacles because women at CIW do not have computer access, so incarcerated women applying for enrollment in Chaffey’s programs must do so by hand.³⁴³ This drastically slows down the application process, causing many students to self-withdraw.³⁴⁴ This may contribute to lowering incarcerated women’s participation in existing educational programs. Remarking on the low participation rate of incarcerated women, one CIW Think Tank member notes, “The likely causes for this are a history of negative experiences with school, a sense of helplessness or lack of hope for a better future, or profound past trauma that interferes with emotional readiness for school.”³⁴⁵

Correspondence courses at CIW pose a challenge for women who enter prison with low levels of literacy, or whose trauma or other conditions make self-study especially difficult. Students suffer delays in mailing of their materials and “because it’s not face-to-face, there is no dialogue, no interaction.”³⁴⁶ This leads to ineffective teaching as there is “a limited ability to help struggling students understand the text materials, difficulty providing high-quality feedback to students on complex tasks that have a variety of acceptable responses, challenges in developing students’ practical skills (social and psychomotor), and an inability to provide adequate feedback in these areas.”³⁴⁷ Additionally, “the correspondence format means that the rich discourse and analysis that occurs in a classroom setting is totally absent. . . . Students must be highly focused and self-motivated to succeed . . . which is a great challenge, especially for students who have never had formal college experience.”³⁴⁸

337 Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174.

338 Consultation with CIW Think Tank, *supra* note 110.

339 Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174.

340 The passing of SB 1391 in California allowed community colleges in-person access to and offered full funding for courses in prisons. STANFORD LAW SCH. & BERKELEY LAW, DEGREES OF FREEDOM: EXPANDING COLLEGE OPPORTUNITIES FOR CURRENTLY AND FORMERLY INCARCERATED CALIFORNIANS 11 (2015), https://www.law.berkeley.edu/files/DegreesofFreedom2015_FullReport.pdf.

341 Skype Interview with Ella Turenne, *supra* note 263 (stating that while New York has the second largest population—behind California—we have one in-person degree-granting program while New York has five).

342 Consultation with CIW Think Tank, *supra* note 110.

343 Skype Interview with Laura M. Alvarado, *supra* note 306.

344 *Id.*

345 Consultation with CIW Think Tank Member Paige Linville, *supra* note 293.

346 Consultation with CIW Think Tank, *supra* note 110.

347 STANFORD LAW SCH. & BERKELEY LAW, *supra* note 340, at 48.

348 Consultation with CIW Think Tank Member Paige Linville, *supra* note 293.

Though Chaffey’s programs offer greater soft-skills building, they are not without flaws. For example, completion of Chaffey’s program currently does not allow for transfer to a four-year university.³⁴⁹ The college is also prohibited from proactively working with students on parole once they have been released—due to a contractual condition of entering the prison—unless the students self-identify.³⁵⁰

Lastly, CIW students who wish to pursue an education beyond an associate degree must fund this education on their own—there is no funding available to them.³⁵¹ One CIW Think Tank member notes: “While some schools offer higher degrees, they are usually expensive and may lack accreditation.”³⁵² Funding available through the U.S. Department of Education’s Second Chance Pell Grant Pilot Program does not extend to bachelor’s programs for students at CIW.³⁵³ For students without family members who can support their educational endeavors, wages from job assignments are insufficient to support such an expense.³⁵⁴

Tailored Curriculum and Job Opportunities

“A lot of women don’t even put ‘career’ in their life plan.”³⁵⁵

Although technical and soft skills training is essential, the institutional availability of a curriculum and job opportunities based upon the intersection of the career goals of the incarcerated individuals and outside job opportunities is imperative. Justice-involved women do not dream of getting on General Relief or Supplemental Security Income and want to be self-sufficient through a career.³⁵⁶ The importance of considering career goals lies in the difference between a job and a career—while a job is a means of financial necessity, a career yields higher self-esteem and “a deeper personal investment in [the individual’s] work.”³⁵⁷

349 The college is hoping to make a change that would allow their students to transfer. Skype Interview with Laura M. Alvarado, *supra* note 306.

350 *Id.*

351 Consultation with CIW Think Tank Member Paige Linville, *supra* note 293.

352 *Id.*

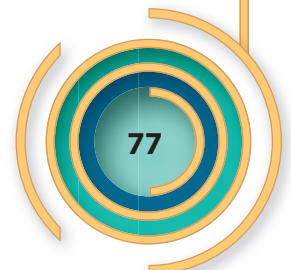
353 Press Release, U.S. Dep’t of Educ., 12,000 Incarcerated Students to Enroll in Postsecondary Educational and Training Programs Through Education Department’s New Second Chance Pell Pilot Program (June 24, 2016), <http://www.ed.gov/news/press-releases/12000-incarcerated-students-enroll-postsecondary-educational-and-training-programs-through-education-departments-new-second-chance-pell-pilot-program>.

354 *About CALPIA*, CALIFORNIA PRISON INDUSTRY AUTHORITY, <https://www.calpia.ca.gov/about/> (last visited May 5, 2018) (stating that CALPIA workers receive \$0.35 to \$0.95 per hour in wages). The wages provided to incarcerated workers through these job programs have been heavily criticized as “slave labor” that benefits CALPIA and partnering private businesses. See Brian Grabianowski, *Rehabilitation Program Leads Campus Debate Over Prison Labor*, GOLDEN GATE XPRESS (Oct. 27, 2015), <http://goldengatexpress.org/2015/10/27/rehabilitation-program-leads-campus-debate-over-prison-labor/> (“It’s simply slave labor, and the so-called skills taught aren’t useful under any circumstances or even applicable in today’s job market.”) (quoting Joseph Miles, Office Coordinator of Project Rebound at S.F. State University); Yvonne Yen Liu, *Prison Strike’s Financial Impact in California*, SOLIDARITY RES. CTR. (Oct. 2016), <http://solidarityresearch.org/wp-content/uploads/2016/10/Prison-Strike-in-California-10-07-16.pdf> (“Each incarcerated worker generated \$12,037 in annual profit for the prison system. Yet, each worker earned only \$445.”).

355 Consultation with CIW Think Tank, *supra* note 110. Think Tank members noted that women currently enrolled in Chaffey and those in the Think Tank are not a representative sample of the general population at CIW. Many do not take advantage of some of the resources available, perhaps with the belief that they must return to the circumstances they left.

356 Interview with Tiffany Johnson, *supra* note 39.

357 Amy Wrzesniewski et al., *Jobs, Careers, and Callings: People’s Relations to Their Work*, 31 J. RES. PERSONALITY 21, 22 (1997).



The ability to consider and work towards career goals allows individuals to realize their value as human beings.³⁵⁸ However, currently, “[women] are being forced to work in jobs that are not of their own choosing and paid pennies per hour or sometimes not paid at all.”³⁵⁹ One CIW Think Tank Member offers the following example: “My good friend has four college degrees and is well suited for a clerk job, but she is forced to work ten-hour days sewing.” Additionally, many justice-involved individuals may opt to choose jobs just to get by. There is a lack of resources within CIW to motivate and assist women in building a career or vocational plan.³⁶⁰

Resources Available After Reentry

“After her parole was over thirteen months later, all that help she received was over and done. She felt like they just threw her out after that.”³⁶¹

The lack of a centralized system of information about reentry employment resources creates great difficulty for reentering women. Many rely on their parole officers to provide such assistance, but navigational help from parole agencies ceases when an individual completes parole.³⁶² The information gap is potentially further exacerbated by reentering women’s lack of technological proficiency since they are denied computer access while incarcerated.³⁶³ Even during incarceration, women are largely unaware of the reentry employment resources available to them. Despite the existence of reentry guides at CIW, “most of the women in [CIW] don’t use [them] because they’re intimidated” by the sheer volume of the guides, which are over a thousand pages long.³⁶⁴ Many thus rely on information provided by the prison staff, which means people who are incarcerated remain uninformed of available resources and programs of which staff are unaware.³⁶⁵ Lack of access to job-specific information makes it harder for incarcerated women to develop training plans based on their career goals.³⁶⁶

Furthermore, many reentering individuals—especially women—suffer from trauma.³⁶⁷ Trauma-centered care is inadequate in Los Angeles, which makes it difficult for reentering women to access the support they need.³⁶⁸ Trauma support should begin while women are incarcerated and should be available to them when they reenter. One advocate notes that, even for individuals who are able to secure employment upon reentry, typically “no one is helping support that person to actually get that job, then stay in that job, and understand the triggers and the stress of being in this new job.”³⁶⁹

358 Consultation with CIW Think Tank, *supra* note 110.

359 DIANE CAMPOS, *MAY THE DEATH OF OUR SISTERS BE NOT IN VAIN* 3 (2016).

360 See Report on Timeline to Re-Entry from the CIW Think Tank to UCLA Law International Human Rights Clinic (Oct. 9, 2016) (on file with authors).

361 Consultation with CIW Think Tank, *supra* note 110.

362 *Id.*

363 Consultation with CIW Think Tank, *supra* note 110 (posing the dilemma: “if you don’t know how to use a computer, how can you access what is available?”).

364 *Id.*

365 Interview with Chris Bisbano, Kathryn Carner, and Jeremie Loncka, *supra* note 174.

366 Interview with Jamie, Elaine, and Michelle, *supra* note 151.

367 This issue is further elaborated upon *infra* Section III.B.1.ii.

368 Interview with Kimberley Guillemet, *supra* note 247.

369 Skype Interview with Anna Cho Fenley, Dir. Californians for Safety and Justice (Nov. 18, 2016), *supra* note 141.

Many vital services are not available in prisons—services that would greatly benefit individuals transitioning into parole; such as resume building, cover letter writing, and mock interviews.³⁷⁰ The unavailability of these resources leads to missed opportunities for incarcerated individuals to “identify their strengths and weaknesses, transferrable skills, and work values.”³⁷¹ Mentorship programs are necessary even prior to release as they would allow individuals, who have spent an extensive amount of time navigating the network of resources, to help guide those who are just beginning the process.³⁷² Although mentorship programs exist for women released from incarceration, these generally match formerly incarcerated women with volunteers who have not been involved with the justice system. At the same time, although mentorship programs with individuals who have completed parole or are further into their parole would greatly benefit returning women,³⁷³ many have parole conditions preventing them from associating with others who have been justice-involved.³⁷⁴

Applicable Policy: Job Opportunities

Prison education programs and availability of post-parole resources amount to nothing if formerly incarcerated women have no job opportunities. There has been success in job security from work programs in construction labor and carpentry through union partnerships because participating unions are supportive of the incarcerated women in their programs.³⁷⁵ Some volunteers of the Canine Support Teams Prison Puppy Program have also been able to secure employment as dog trainers after parole.³⁷⁶

370 See Skype interview with Sam Lewis, *supra* note 174 (listing as an example of challenges formerly incarcerated individuals face the complexity of some interview questions, such as “tell me about yourself”).

371 Kevin D. Sawyer, *Potential Employers Interview Inmates for Brighter Futures*, SAN QUENTIN NEWS (July 1, 2016), <https://sanquentinnews.com/potential-employers-interview-inmates-for-brighter-futures/>.

372 *Id.*; accord Consultation with CIW Think Tank Member Meme, *supra* note 252 (“One of the major factors in my success has been the women that have mentored me along the way.”).

373 Skype Interview with Anna Cho Fenley, *supra* note 141 (encouraging mentorship as a move away from “check-off list of resources to real wraparound advocacy”); see Scott Shafer, *Released Murderers Mentor Other Ex-Lifers on Parole*, KQED NEWS (Mar. 16, 2015) (recounting a monthly meeting where individuals who were given life sentences mentor each other and share practical advice—such as seeking employment—in a pilot program operated by California’s Division of Adult Parole Operations), <https://www.kqed.org/news/10454664>; Skype interview with Sam Lewis, *supra* note 174 (saying that because parole officers have to allow paroled individuals living in transitional housing to be able to associate with other formerly incarcerated individuals, is starting to see that positive influence from others who have successfully reentered can lead to better outcomes).

374 Consultation with CIW Think Tank, *supra* note 110 (qualifying that individuals may get approval from parole agents for such correspondence in order to avoid violating parole conditions).

375 *Id.*

376 Consultation with CIW Think Tank Member Paige Linville, *supra* note 293.

There has been success in job security from work programs in construction labor and carpentry through union partnerships.

REALITY—JOB OPPORTUNITIES ARE SCARCER FOR RETURNING WOMEN THAN FOR RETURNING MEN

“My biggest challenge is being a 67-year-old woman who [is trying to] find something [to do] to take care of myself. I would like autonomy and not [to] be indebted to someone else.”³⁷⁷

Although the products from CALPIA work programs are mostly sold to the government, a large portion remains contracted work by private companies.³⁷⁹ These companies, however, are resistant to hiring formerly incarcerated women.³⁷⁸ Tiffany Johnson of ANWOL criticized this, stating, “We spend years and years dedicating our lives in learning these skills in there, and then when we come out we can’t use them because . . . those particular companies don’t hire people who have been in the system.”³⁸⁰

Moreover, most available jobs for formerly incarcerated individuals are hard labor jobs.³⁸¹ Fields dominated by men, such as construction and manufacturing, tend to be less concerned about prior incarceration.³⁸² Many returning women are not capable of accepting these jobs due to physical and mental health barriers. Due to the extensive incarceration sentences imposed by the U.S. justice system, a large portion of women reentering are middle-aged, which creates a physical barrier to a majority of hard labor work.³⁸³ These gender discrepancies in job availability translate into financial instability, as “women in the justice system are underemployed and unemployed, work fewer hours than men, make less per hour than men and often are employed in temporary low-level occupations with little chance for advancement.”³⁸⁴ In addition, many women entering the justice system have previously experienced trauma—which has been further exacerbated by the experience of incarceration.³⁸⁵ Returning women need job opportunities that do not create trigger risks for women who have experienced trauma before and during their incarceration.

377 Consultation with CIW Think Tank Member Leslie, *supra* note 17.

378 See CAL. PRISON INDUSTRY AUTHORITY, REPORT TO THE LEGISLATURE FISCAL YEAR 2008–2009 11 (2009).

379 Interview with Tiffany Johnson, *supra* note 39.

380 *Id.*

381 *Id.*

382 BARBARA E. BLOOM, MEETING THE NEEDS OF WOMEN IN CALIFORNIA’S COUNTY JUSTICE SYSTEMS 11 (2015).

383 Interview with Tiffany Johnson, *supra* note 39.

384 BLOOM, *supra* note 382, at 15.

385 Paige Linville, *supra* note 75, at 4 (“Thirty-three percent of incarcerated females already exhibit post-traumatic stress disorder due to past abuse, which is exacerbated by prison living.”) (citing STEPHANIE COVINGTON, A WOMAN’S JOURNEY HOME).

Accessibility

Accessibility refers to the openness of the labor market to all individuals seeking employment, taking into account whether available employment opportunities are within reasonable proximity.³⁸⁶ This implicates the impact of probation obligations and criminal conviction disclosures on employment, as well as the affordability of public transit for formerly incarcerated individuals.

Applicable Policy: Openness of the Labor Market

As mentioned in Section I, “the box” refers to questions on job applications inquiring about an individual’s past convictions. Eighty percent of Los Angeles employers will not hire people with past convictions,³⁸⁷ which they determine via the box. This limits the availability and types of jobs for formerly incarcerated individuals and contributes significantly to the seventy percent unemployment rate for those returning to Los Angeles.³⁸⁸ On September 27, 2016, the City Council’s Economic Development Committee approved a proposed Los Angeles Ordinance to expand California’s law banning the box on government job applications to all city contractors and private businesses with ten or more workers.³⁸⁹ The Los Angeles City Council voted to pass this Ordinance on November 30, 2016, and the law went into effect in 2017.³⁹⁰ Furthermore, initiatives and resources, such as the Los Angeles Mayor’s Blue Ribbon Commission on Employment Equity and the CoFFE, provide a buffer against the existence of the box. Public and private employers participating in the Blue Ribbon Commission³⁹¹ and CoFFE³⁹² are willing to hire applicants with convictions. Employers connected with ARC will often directly contact ARC with employment opportunities, based on the success they have had with previous ARC members.³⁹³

The state and federal governments have enacted financial incentives to overcome the prejudice many employers may have towards applicants with prior convictions. The California New Employment Credit, one of three incentives under Governor Brown’s 2013 New Economic Development Initiative, provides tax credits for certain qualifying trades and businesses that hire qualified employees—such as individuals with prior felony convictions.³⁹⁴ Similarly, the federal

The state and federal governments have enacted financial incentives to overcome the prejudice many employers may have towards applicants with prior convictions.

386 See *supra* Section II.

387 Rachel Benioff, Tackling Employment Discrimination Against Former Prisoners, UCLA Luskin Sch. of Pub. Affairs: Ctr. for Civil Soc’y (Apr. 2008), <http://civilsociety.ucla.edu/practitioners/profiles-in-engagement/tackling-employment-discrimination-against-former-prisoners>.

388 Interview with Kimberley Guillemet, *supra* note 247.

389 Walton, *supra* note 34.

390 Tim Loc, L.A. Votes to ‘Ban the Box,’ Lowering Barriers to Employment for Formerly Incarcerated Individuals, LAIST (Nov. 20, 2016), http://laist.com/2016/11/30/ban_the_box.php. L.A., Cal., Ordinance 184652 (Dec. 7, 2016).

391 Interview with Kimberley Guillemet, *supra* note 213.

392 THE NEXT STEP, <https://www.thenextstep99.com> (last visited May 5, 2018).

393 Skype interview with Sam Lewis, *supra* note 174.

394 See *New Employment Credit – Quick Facts*, STATE OF CAL. FRANCHISE TAX BD., https://www.ftb.ca.gov/online/New_Employment_Credit_Reservation/Quick_Facts.shtml (last visited May 5, 2018) for the requirements businesses must meet to receive the tax credit.

Department of Labor’s Work Opportunity Tax Credit provides employers with tax credit for each eligible hire. One eligible group comprises of people with prior felony convictions and hires within one year of conviction or reentry.³⁹⁵ Lastly, the federal Employment Development Department’s Fidelity Bonding Program provides employers financial assurance—against theft, fraud, or other dishonest acts—in hiring applicants who have prior convictions.³⁹⁶

As an additional maneuver around the box, conviction reductions and expungements may be available to reentering women. While governmental entities will still be able to access an applicant’s conviction record, private entities, such as private employers, cannot access expunged records. This allows justice-involved individuals to seek employment with private employers with the knowledge that the employer will not be able to access conviction information.

REALITY—ALTERNATIVES TO THE BOX, OTHER POLICIES AND PERSISTENT INCARCERATION STIGMA REMAIN POWERFUL BARRIERS TO EMPLOYMENT FOR REENTERING WOMEN

“Where I live, there are no jobs for anyone, let alone a parolee.”³⁹⁷

Although initiatives such as the Mayor’s Blue Ribbon Commission on Employment Equity provide some benefits, alternatives to the box and persistent incarceration stigma remain a serious barrier to accessing job opportunities for justice-involved individuals. Even without the box, many job application questions are worded to ask for the same information.³⁹⁸ In addition, many jobs for which past criminal justice-involvement is irrelevant nonetheless require background checks.³⁹⁹ Not only do applicants lack an opportunity to explain the circumstances of their conviction,⁴⁰⁰ but formerly incarcerated individuals are also held back by their own stigmatic self-perception.⁴⁰¹ Moreover, convictions can also bar licensing in many fields, thus preventing access to those.⁴⁰²

Even financial strategies for diffusing employer prejudice do not appear to be very successful. Employers have not taken full advantage of the federal and state government’s financial incentives and benefits; and many complain about the time and obstacles in the application process for such incentives.⁴⁰³

Finally, many felony convictions are ineligible for expungement.⁴⁰⁴ Expungement of remaining felony convictions and some misdemeanor convictions is entirely discretionary, meaning reentering women have no guarantee they will be able to benefit from it.

395 *Work Opportunity Tax Credit*, U.S. DEP’T OF LABOR EMP’T & TRAINING ADMIN., <https://doleta.gov/business/incentives/opptax/eligible.cfm> (last visited May 5, 2018).

396 EMP’T DEV. DEP’T, EDD FIDELITY BONDING PROGRAM FACT SHEET (2015), http://www.edd.ca.gov/pdf_pub_ctr/de8714ff.pdf.

397 Consultation with CIW Think Tank Member Meme, *supra* note 252.

398 Focus Group Interview with Jamie Galang, Elaine Espinoza, and Michele Payne, *supra* note 151.

399 *Id.*

400 *Id.*

401 Consultation with CIW Think Tank, *supra* note 110 (“[I]f I couldn’t get a job before being in prison, what makes me think I can do better with this extra label?”).

402 Focus Group Interview with Jamie Galang, Elaine Espinoza, and Michele Payne, *supra* note 151.

403 Interview with Emily Blake, Senior Coordinator, Los Angeles Area Chamber of Commerce, in L.A., Cal. (Oct. 26, 2016).

404 A NEW WAY OF LIFE REENTRY PROJECT, ANWOL-UCLA LAW REENTRY LEGAL CLINIC TRAINING, 5–7 (Ver. 2.6, 2015).

Physical Accessibility and Transportation: Applicable Policies and Programs

Understanding that access to public transit requires financial resources, some programs in Los Angeles offer transportation assistance to formerly incarcerated women. LA:RISE offers one example.⁴⁰⁵ The Caltrans Workforce Development & Employment Partnership will provide its participants with bus tokens for free public transportation.⁴⁰⁶ ARC provides TAP cards for its members who would otherwise have no access to transportation.⁴⁰⁷

REALITY—PUBLIC TRANSIT IN LOS ANGELES OPERATES UNDER SUCH A LIMITED NETWORK THAT IT IS NOT USEFUL FOR REENTERING WOMEN WHO MUST TRAVEL FOR EMPLOYMENT OPPORTUNITIES

“The transit system [in greater Los Angeles] is not connected and trying to get from one place to the next is nearly impossible without a car.”⁴⁰⁸

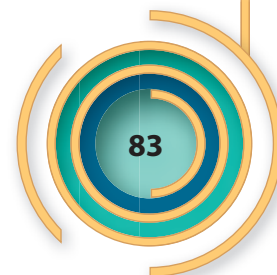
Transportation remains a large issue for reentering women seeking employment as well as for those who have employment. This is in part due to the wide geographic spread of Los Angeles, and its limited public transit network. Public transit in Los Angeles offers no transportation subsidies for formerly incarcerated women, many of whom cannot afford the fares. Many are forced to rely on friends and family for transportation assistance to report to parole officers. But such assistance is unavailable to most reentering women.

405 LA:RISE, *supra* note 315.

406 Interview with Kimberley Guillemet, *supra* note 247.

407 Skype interview with Sam Lewis, *supra* note 174.

408 Consultation with CIW Think Tank Member Leslie, *supra* note 17.



CONCLUSION AND RECOMMENDATIONS

RECOMMENDATIONS FOR ACHIEVING A HUMAN RIGHTS-COMPLAINT APPROACH TO THE HOUSING AND EMPLOYMENT NEEDS OF REENTERING WOMEN

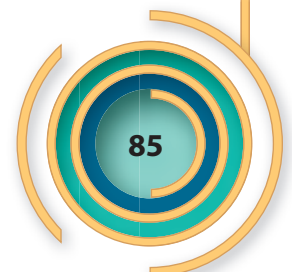
This section sets out specific and general recommendations that reflect the needs and opinions of the women consulted in producing this report. They are a synthesis of the views expressed by the Think Tank with the views of community partners and stakeholders consulted during the production of the report. They provide local authorities with guidance on how they may achieve human rights-compliant reentry policies. The adoption of the CEDAW Ordinance by the City of Los Angeles has created an opportunity to transform reentry policies and practices in accordance with important human rights standards. In implementing the following recommendations local authorities would realize the commitments made in this ordinance in a way that gives primacy to the voices of those directly impacted. Some of the recommendations put forward will require the participation of state authorities, and it is within the power of local authorities to seek out this engagement and secure cooperation on behalf of the women they have committed themselves to protecting and advancing.

The following section first outlines the specific policy recommendations for Los Angeles local authorities to implement with regards to housing. The specific recommendations on housing follow the five elements from the ICESCR Committee General Comment 4 highlighted by the report. The section then goes on to outline general recommendations regarding housing that should be adopted by local authorities. The section then moves to state specific recommendations with regards to employment that follow the three elements from the ICESCR Committee General Comment 18. This is followed by general recommendations on the right to employment that the city must adopt to fulfil the human rights of reentering women to access employment.

Specific Reentry Housing Policy Recommendations for Los Angeles Local Authorities

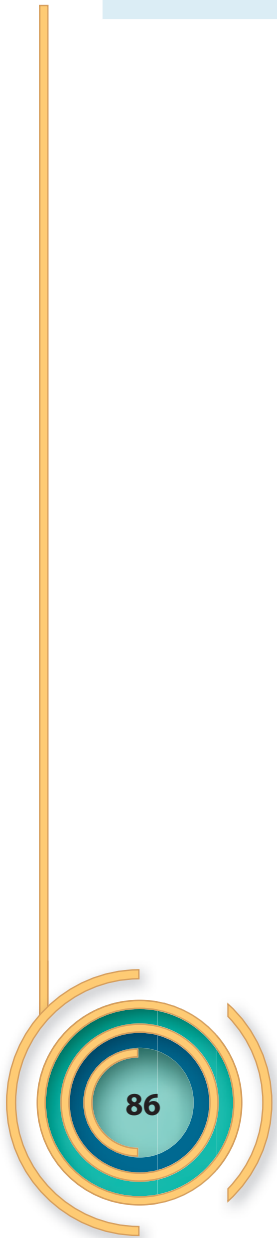
Human Rights Requirement	Recommendation
<p>Security of Tenure</p>	<ul style="list-style-type: none"> ■ Utilize a “housing first” approach in transitional housing by implementing clear, trauma-informed, and uniformly enforced policies and rules. Refrain from non-holistic and zero-tolerance policies that lead to housing insecurity. ■ Address tensions within families regarding an incarcerated family member’s return by engaging in better outreach with families already on the Section 8 Program. Provide a forum for families to articulate the concerns, fears, or hopes that may stifle or encourage their participation in HACLA’s Pilot Reentry Program. ■ Make trauma services readily available for families in federal housing programs that are unwilling to reunite with a reentering formerly incarcerated family member so that they can work through past harms and trauma cycles. ■ Amend HACOLA’s admission rules for its public housing program to ensure that individuals on probation or parole are not automatically precluded from applying and participating in its public housing program.
<p>Affordability</p>	<ul style="list-style-type: none"> ■ Address the intersection of child custody laws and housing affordability for reentering mothers hoping to reunite their families. ■ Build affordable housing with a focus on formerly incarcerated women. ■ Strengthen coalitions amongst key private stakeholders, such as the Apartment Owners Association and the Minority Apartment Owners Association, in order to help them advocate for affordable housing and combat private development advocates such as the California Legislative Analyst’s Office. Research and further articulate pragmatic cost-savings arguments and data on the long-term effects of affordable housing on displacement reduction. ■ Provide additional incentives, such as tax breaks, to private landlords and developers.
<p>Location</p>	<ul style="list-style-type: none"> ■ Allow for more flexibility for reentering women to choose their parole location by making the process of requesting a change clear and accessible, and by providing timely responses to requests. ■ Research the connection between parole placement, communities’ cultures, and recidivism.
<p>Accessibility</p>	<ul style="list-style-type: none"> ■ Ensure that transitional housing and public housing authorities provide trauma-informed services. ■ Pass antidiscrimination legislation to address housing discrimination against the formerly incarcerated. ■ Forge working partnerships between local public housing authorities, such as HACLA and HACOLA, and the City of Los Angeles to bring about greater distribution of the information in HUD’s Guidance Note to begin to erode criminal history-related barriers to housing resources within the greater Los Angeles area. This distribution could take many forms, including public education seminars, know-your-rights-pamphlets, and workshops for developers. Additionally, in order to address the obvious limitations of the Guidance Note’s legal enforceability and to overcome oppositionists’ concerns, the city of Los Angeles must introduce legislation providing legal protections against discriminatory policies affecting reentering formerly incarcerated persons. ■ Assess the local viability of legislation such as San Francisco’s 2014 Fair Chance Ordinance, which addresses the discriminatory effect that housing policies have on persons with arrest and conviction records.⁴⁰⁹ ■ Engage in broader outreach to key landlord stakeholders to build the trust and understanding necessary to de-stigmatize individuals with criminal records. Direct resources towards organizing town halls and facilitating transparent meetings of stakeholders, especially formerly incarcerated women. Educate landlords’ associations about the population of formerly incarcerated women to address barriers to access in the private housing market. ■ Create or expand facilities to accommodate children impacted by their mothers’ incarceration. For some reentering women, this simply means allowing them housing space to care for their child. For others who seek to participate in wider reentry programming such as job training, trauma care, health care, or education, it means providing childcare and education services, thereby allowing reentering women to focus on their own successful reentry. Many reentering women prioritize their children’s needs before their own; facilities should thus work to alleviate the perception among many women that the reentry process is discriminatory against mothers. ■ Dismantle further barriers that reentering women face in the search for housing, such as the disqualification of prospective tenants based on mental health concerns. Pressure housing providers to provide more spaces to reentering women without additional qualifying or disqualifying admission factors.

409 See Hum. Rts. Commission, *Fair Chance Ordinance*, <http://sf-hrc.org/fair-chance-ordinance> (last visited May 5, 2018).



Conclusion and Recommendations

Education	<ul style="list-style-type: none"> ■ Begin education and reentry for secure affordable housing early in the period of incarceration.
Access to Information	<ul style="list-style-type: none"> ■ Disseminate clear and accessible information about HACLA’s Section 8 Pilot Reentry Program more widely to currently and formerly incarcerated women.
Cultural Adequacy	<ul style="list-style-type: none"> ■ Begin family reunification services during incarceration, including family and child counseling, easily accessible family visits, and family education. ■ Create peer “family-to-family” mentorship programs that connect families that have successfully reunited with families who are anticipating reunification. Encourage community organizations and service providers to start programming that supports families while the eventually reentering family member is still incarcerated. ■ Support community efforts to create networks and coalitions of formerly incarcerated people that mentor and encourage one another. Remove parole restrictions that undermine the capacity of formerly incarcerated women to support each other. ■ Work with CDCR and former participants in CCTRP and FOTEP to expand transitional housing programs and their admission criteria. Collect data on successful reentry by former CCTRP and FOTEP participants in order to advocate for the following changes: (1) clearance of CDCR’s backlog of applications to these programs; and (2) allowing more people to participate in transitional housing programs by removing factors such as preclusions based on the convicted offense that led to the incarceration. Compile this data and plan strategic initiatives to meet these goals in partnership with former CCTRP and FOTEP participants.
Participation	<ul style="list-style-type: none"> ■ Create a mechanism by which currently and formerly incarcerated women can communicate with local government authorities about their needs and their perspectives on the implementation of policies that affect their lives.



GENERAL RECOMMENDATIONS FOR LOCAL AUTHORITIES REGARDING THE RIGHT TO HOUSING FOR REENTERING WOMEN

In addition to the specific reentry housing policy recommendations above, local authorities in Los Angeles must adopt the following general recommendations:

- **Los Angeles local authorities must develop a housing strategy** that “defines the objectives for the development of shelter conditions, identifies the resources available to meet these goals and the most cost-effective way of using them and sets out the responsibilities and time frame for the implementation of the necessary measures[.]”⁴¹⁰
- **Los Angeles local authorities must promote participation of and consultation with affected groups in the development of strategies of implementation of the right to housing.**⁴¹¹ Meeting this obligation will require creating accessible and effective mechanisms through which currently and formerly incarcerated women can engage in meaningful dialogue with policy-makers.
- **Los Angeles local authorities must refrain from gender discrimination in the creation of housing policy and its implementation.**⁴¹² This necessitates taking a “gender-responsive approach,” which takes gender into account when addressing differences in the experiences of formerly incarcerated men and women.⁴¹³
- **Los Angeles local authorities must coordinate with other spheres of local government,** such as the County of Los Angeles, to harmonize their work with the housing strategy.⁴¹⁴
- **Los Angeles local authorities must effectively monitor implementation** and conduct research to discover the extent of homelessness and inadequate housing in its jurisdiction and to “provide detailed information about those groups within...society that are vulnerable and disadvantaged with regard to housing[.]”⁴¹⁵ In Los Angeles, one of these vulnerable and disadvantaged groups are women with past criminal justice involvement. More research must be done to fully understand the extent of homelessness and housing insecurity among this group.

410 General Comment 4, *supra* note 113, at para. 12.

411 *Id.*

412 General Comment 4, *supra* note 113, at para. 9.

413 Judith Berman, *Women Offender Transition and Reentry: Gender Responsive Approaches to Transitioning Women Offenders from Prison to the Community* (2015) <https://s3.amazonaws.com/static.nicic.gov/Library/021815.pdf>.

414 *Id.*

415 *Id.*

Specific Reentry Employment Policy Recommendations for Los Angeles Local Authorities

Human Rights Requirement	Recommendation
<p>Availability</p>	<ul style="list-style-type: none"> ■ Assign case managers to reentering women during incarceration and upon release to assist with finding and securing employment. ■ Implement peer-to-peer programs, mentoring programs, and other systems of support for job readiness, career and vocational planning, settling into a new job, staying in the job, and dealing with job-related stressors. Services provided should include resume building, cover letter writing, and mock interviewing. ■ Implement more in-person education/skill-building programs and tie success within these programs to incentives such as reduced sentences. Ensure that credits from education programs transfer to four-year universities. Provide funding for incarcerated individuals to access educational opportunities, including degree programs. ■ Establish training programs and create job opportunities in sectors other than hard labor. ■ Expand programs such as community development financial institutions, which provide financial loans to under-served and low-income communities, particularly to fund educational endeavors. ■ Expand programs such as Project Rebound, which provides services such as assistance with school applications, mentorship, tutoring, and personal support with finances and psychological wellbeing. ■ Reform parole programs that prevent formerly incarcerated people from associating with each other in order to promote beneficial mentoring relationships. ■ Allow colleges to work with students on parole after they are released. ■ Connect reentering women with employers prior to their release from incarceration. Connect students with jobs upon graduation or parole through career technical education courses. ■ Host employment resource fairs within and outside of carceral facilities. ■ Increase the availability of in-person arts programs that develop soft skills. Ensure that access to these programs is available and permissible upon parole. ■ Establish more community-based employment reentry programs. ■ Ensure all services are trauma-informed and focused on rehabilitation. Provide trauma-centered care beginning when individuals are incarcerated, and ensure all services before and during incarceration are trauma informed. ■ Create a task force to develop a centralized online employment resource database and improve dissemination of reentry services information. ■ Increase computer access during incarceration, particularly for education and employment-related applications.
<p>Accessibility</p>	<ul style="list-style-type: none"> ■ Start education and public outreach programs to eliminate prejudice against women facing reentry. ■ Establish educational programs for employers and employment agencies in particular to increase their acceptance of hiring formerly incarcerated people. ■ Reduce bureaucratic obstacles and/or increase financial incentives, such as tax credits, for employers to hire formerly incarcerated individuals. ■ Prohibit employers from requiring disclosure of past criminal justice involvement where this information is irrelevant for the positions that reentering women seek. ■ Tailor background checks to specific jobs, and only require these checks where they are necessary. ■ Eliminate discretionary decision-making in the expungement process and establish criteria to standardize the process and to make it fair. Establish more expungement clinics. ■ Provide public transportation subsidies for reentering women and/or create ride-share/van programs to assist with employment transportation needs. ■ Remove restrictions on parole locales and permit women to return to the communities where they believe they can rebuild their lives. ■ Disassociate education level from eligibility for work programs.
<p>Acceptability & Quality</p>	<ul style="list-style-type: none"> ■ Improve access to social services for reentering women and eliminate disqualifying factors related to incarceration. ■ Create a complaints and enforcement mechanism to hold employers accountable for employment violations targeting reentering women. ■ Enact legislation to guarantee equal remuneration for reentering women.

GENERAL RECOMMENDATIONS FOR LOCAL AUTHORITIES REGARDING THE RIGHT TO EMPLOYMENT FOR REENTERING WOMEN

In addition to the specific reentry employment policy recommendations above, local authorities in Los Angeles must adopt the following general recommendations.

In keeping with the approach found in international human rights law, Los Angeles local authorities must take the following immediate steps to fulfill the human right to employment for reentering women:

- **Los Angeles local authorities must “refrain[] from denying or limiting equal access to decent work for all persons**, especially women disadvantaged and marginalized individuals and groups, including prisoners or detainees[.]”⁴¹⁶ Both incarcerated and formerly incarcerated women require equal access to decent work.
- **Los Angeles local authorities must consult and partner with women facing reentry to assess their needs and collaboratively formulate and implement future policy to ensure equality and employment opportunities.**⁴¹⁷
- **Los Angeles local authorities must develop a plan to ensure that reentering women have effective access to information concerning their rights and available resources** with respect to employment.⁴¹⁸
- **Los Angeles local authorities must protect reentering women from employment discrimination** by holding violators accountable and developing a plan to eliminate practices and biases that disadvantage them.⁴¹⁹
- **Los Angeles local authorities must take effective measures to promote equal job access, training, and opportunities for reentering women**, including developing and adopting necessary legislation.⁴²⁰
- **Los Angeles local authorities must form a plan to fulfill the right to work for reentering women who face barriers.** The formation of this plan should involve the participation of reentering women and outline how Los Angeles will overcome unemployment.⁴²¹
- **Los Angeles local authorities must develop educational programs for reentering women** to increase their access to employment opportunities.⁴²²
- **Los Angeles local authorities must create a plan to increase public awareness on the right to work** for reentering women.⁴²³

416 CEDAW Committee, Gen. Recommendation 28, para. 9; ICESCR Committee, Gen. Comment 18, para. 23.

417 CEDAW Committee, Gen. Recommendation 28, paras. 24, 27.

418 CEDAW Committee, Gen. Recommendation 28, para. 27.

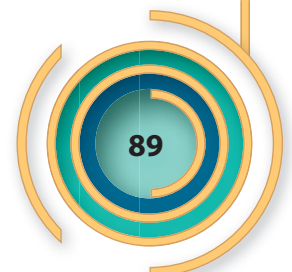
419 CEDAW Committee, Gen. Recommendation 28, paras. 9-10.

420 ICESCR Committee, Gen. Comment 18, paras. 23, 25. Importantly, the ICESCR Committee mentions women as a particular group entitled to decent work. *Id.*

421 ICESCR Committee, Gen. Comment 18, para. 26.

422 ICESCR Committee, Gen. Comment 18, para. 27.

423 ICESCR Committee, Gen. Comment 18, para. 28.



APPENDIX A

CIW THINK TANK NARRATIVES

The remainder of this section contains narratives by members of the CIW Think Tank, expressing their views on various dimensions of the reentry process and system.

PAIGE LINVILLE, “EDUCATION”

For incarcerated women, education has been proven to reduce recidivism and improve the likelihood of successful reentry. Many women enter the prison system with little formal education. The average inmate does not possess a high school diploma or G.E.D. In addition, past trauma or educational failures are the norm and undermine the ability to learn. For all these reasons, it is crucial that education begin immediately upon incarceration. Students frequently require additional support at the beginning of their academic trajectory to build self-confidence and belief in their ability to navigate the educational environment. Once incarcerated women have obtained a G.E.D. or high school diploma, they should be encouraged to continue pursuing their education, either through participation in the myriad vocational/career technical education (CTE) programs or by enrolling in college.

Vocational/CTE programs are designed to prepare individuals for entry into the workforce as a skilled employee upon release. The fields that these programs focus on are typically felon friendly and in high demand. Here at C.I.W., one of the most successful programs is the CALPIA Construction Laborer and Carpentry program. This training lasts for around one year. The benefit of this program is that graduates meet all the criteria to join a construction union when released, which drastically improves the chances of rapidly securing gainful employment. Other CTE programs offered at C.I.W. include: Electronics- Fiber Optic Copper Based Cabling, Office Services and Related Technology (which offers the opportunity to become Microsoft Office Specialist Certified in Word, Excel, and PowerPoint applications), Cosmetology, Health Care Facility Maintenance, and Building Maintenance and Construction Technology. While these programs each offer a certification, the majority of them do not guarantee employment. Also, these programs lack an emphasis on soft skills. Another option for vocational preparation is the Canine Support Teams Prison Puppy Program (CST-PPP). This is a voluntary program, not a job assignment; therefore it can augment other rehabilitative efforts. This program utilizes incarcerated individuals to train dogs for placement with disabled individuals. Participants learn basic dog training skills and specialized service dog training skills. Upon release, many women who were a part of this program secure employment as dog trainers.

Participating in college while incarcerated is very different than a typical setting. The majority of college programs are correspondence based (with the notable exception of Chaffey College). The correspondence format means that the rich discourse and analysis that occurs in a classroom setting is totally absent. Students use a textbook to learn subject matter and complete assignments

which are then sent to the instructor. Feedback is sent back to the student through the mail. Students must be highly focused and self-motivated to succeed at correspondence-based courses, which is a great challenge, especially for students who have never had formal college experience. The class completion rate is low, and cheating is rampant. Many students may be enrolled in the same course, but study groups are rare. Therefore, soft skill development is again lacking. One of the major flaws with this type of education is the lack of critical thinking development. Funding is only available through the Associate's Degree level. So any student desiring a Bachelor's Degree or higher must pay for her education out of pocket. While some schools offer higher degrees, they are usually expensive and may lack accreditation. The obstacles to meaningful higher education loom large for the incarcerated student.

Programs are available that focus on soft-skill development. One example is the Prison Education Program (PEP) offered through Cal Poly. This program is offered as a series of around eight evening classes in a variety of subjects ranging from Career Development to Women's Empowerment. Students from surrounding community colleges volunteer their time to come into the prison and facilitate the classes. The participatory nature of the classes simulates a more typical classroom environment. However, the classes are not rigorous and the students do not attain any certification. However, upon release, they are eligible to apply to a reintegration academy, which offers extensive assistance with attaining employment including job fairs, interview skills, and other resources.

Despite the numerous educational opportunities available in prison, the utilization rate is relatively low. Many individuals do not participate in education, and are released without gaining any meaningful skills. Again, the likely causes for this are a history of negative experiences with school, a sense of helplessness or lack of hope for better future, or profound past trauma that interferes with emotional readiness for school. When considering reentry needs, it is important to design pragmatic programs that will easily translate into employment, but also to tailor programs to the interests and needs of the participants. Women are not consulted about the type of programming they desire, and may feel that they are being forced to participate in something that is not relatable or interesting. This can result in disillusionment with the system and resistance to participation.

INTERVIEW OF LESLIE BY LINDA

I was born and raised in L.A. County and in the late 1970s I lived in Echo Park (close to downtown L.A.).

The transit system is not connected and trying to get from one place to the next is nearly impossible without a car. This is key for a successful parole.

I've been incarcerated for 47 years. The advocacy groups in L.A. are supportive and acknowledge my rehabilitation whereas law enforcement doesn't recognize it. This is a big problem for parolees in L.A. where large swaths of those who are hired to maintain order are fighting rehabilitation.

Having spent so much time in prison, I see recidivism as a systemic problem. Reform is necessary so that women born with three strikes against them at birth can be given an opportunity through

intervention, mentorship, and vocational training to change the course of their lives and become contributing citizens to the L.A. area.

I've had decades of group and individual therapy, academic opportunities and have good relationships with the people in the community. I do lots of work with victim-offender awareness and learning personal responsibility.

My vision is that L.A. City have a relationship with the prison. This would mean that employers would come in to speak with the women here, letting them know where the opportunities are when they parole. It would mean that a woman is picked up upon parole by ARC and already has a place to go, and is able to find her way to agencies for job hunts, is guided through the metro system, and that a mentor is there, letting the woman know that she is not out there alone, living sober in the community. I envision a system where the family and the parolee both heal, even though it is not always best for the parolee to go home.

A problem right now is that women who violate their parole don't even have to go to A.A. They will parole on their date and don't even have to go to a program.

I would like to see the community redefine who is coming out and back into their communities: let the public know that they have been rehabilitated.

There needs to be more dialogue between institutions and the prison and community partners. There need to be relationships between the rehabilitation centers, and city council and the mayor's office.

My biggest challenge is being a 67-year old woman who can find something to take care of myself. I would like autonomy and not be indebted to someone else.

Human rights should matter everywhere because we are all connected. For a community to survive there must be a decent level of human rights so that it does not disintegrate into a predator/victim model. In my experience of incarceration, it is amazing what a demonstration of human dignity can have and the impact it can have on a broken individual.

UNTITLED LETTER FROM THINK TANK MEMBER

I have seen lots of girls come in and out of prison. Some come back right away and some in a few years. It's the same never-ending pattern. Are we really just a statistic? Products of our environment? Victims of circumstances? Or did the system fail us? There will always be too many questions and not a lot of answers.

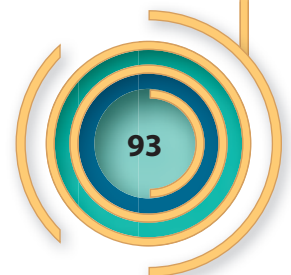
Take for instance my friend *****, age 33, from Los Angeles County, second term. She did her first term at age 21, got convicted of petty theft and got two and a half years in prison from 2004 to 2006. It took her seven years to come back. Now she is serving time for manslaughter: twenty four years. The question here is, why did she come back?

After her first term in 2004/2006 she got out on parole. She was very good while on parole; they helped a lot. She was able to acquire her G.E.D. and a job, but after her parole was over thirteen months later, all that help she received was over and done. She felt like they just threw her out after that and she had no help left. She struggled a lot to find a job, no one wanted to hire her due to her past conviction. Now she had a child to feed and it kept getting harder to provide. She eventually did what she knew how to do best, get easy money, go back to her hood, gangbang again, provide for her and her daughter. Now she's back with a lot of regrets, but a mother in need will do anything for her child.

MEME'S LETTER

The following narrative was shared by a Think Tank member, on behalf of her friend.

This woman from Los Angeles (South Central) was sentenced to state prison. When she was released she returned to L.A. She received her G.E.D. while incarcerated. Her parole required her to go to school or have a job, but she was homeless. She had two kids at the time, because she didn't have no home she returned to crime. She got re-arrested and this cycle continued for many years. Some may say that she had a choice, but being homeless without guidance we're bound to return to a life of crime.

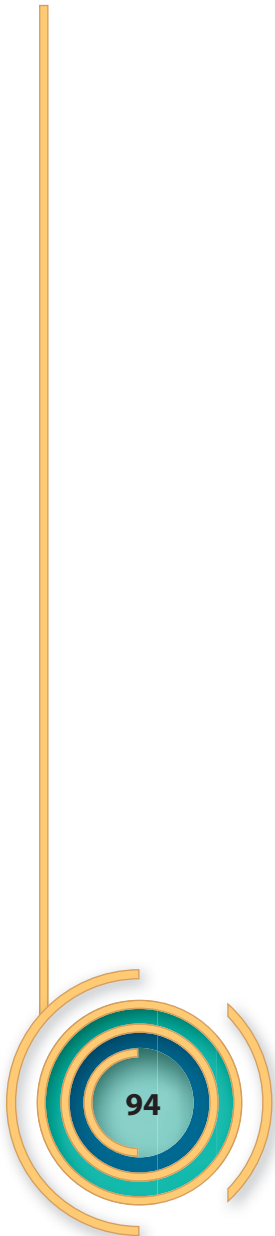


APPENDIX B

REENTRY RESOURCE GUIDE

The Report references a number of organizations and programs operating within the reentry landscape, both inside and outside of prisons. The purpose of this Appendix is to provide an overview of and further information about these organizations in order to make their expertise more accessible and their contributions more visible.

Name of Organization/Program (alphabetically)
A New Way of Life
Actors' Gang Prison Theater Project
Anti-Recidivism Coalition
Federal Interagency Reentry Council
California Department of Corrections and Rehabilitation
California New Employment Credit
California Prison Industry Authority
California Training Benefits Program
Californians for Safety and Justice
Chaffey College
Cooperative of Felon-Friendly Employers
Dress for Success
Housing Authority of the City of Los Angeles
Housing Authority of the County of Los Angeles
InsideOut Writers
Legal Aid Foundation of Los Angeles
Los Angeles Chamber of Commerce
Los Angeles City Council
Los Angeles County Board of Supervisors
Los Angeles Human Right to Housing Collective
Los Angeles Mayor's Blue Ribbon Commission on Employment Equity
Los Angeles Regional Initiative for Social Enterprise
Mayor's Office of Reentry
Neighborhood Legal Services of Los Angeles County
Occidental College
Public Housing Program
Reentry Success Center (Richmond, California)
Section 8 Voucher Program
Section 8 Pilot Reentry Program
United States Department of Housing and Urban Development
Weingart Center for the Homeless
WorkSource Centers



1. A New Way of Life Re-Entry Project (ANWOL)	
Background and Objectives	ANWOL was founded in 1998 by Susan Burton, herself a formerly incarcerated woman, and it is currently run by formerly incarcerated women. ANWOL advances multi-dimensional solutions to the effects of incarceration and works to help women, families, and communities heal from the experiences of incarceration.
Additional Information (including resources/services offered where applicable)	ANWOL offers the following services: <ol style="list-style-type: none"> 1. A reentering home program, including the provision of: pick-ups from prison and jail, clothing, toiletries and hygiene products, assistance in obtaining government documents, weekly 12-step meetings onsite, assistance in obtaining health services including counseling, opportunities to participate in day-treatment, assistance in meeting conditions of parole or probation and transportation assistance; 2. Family reunification services; 3. Reentry and transitional housing services; 4. Reentry housing pilot program; 5. A household goods distribution center; 6. The Reentry Legal Clinic, assisting people with record reclassifications, expungements, accessing professional licenses, challenging background check errors/illegal reporting, and challenging unfair employment discrimination; 7. Community organizing in partnership with All of Us or None – Southern California and the Formerly Incarcerated and Convicted People’s Movement; and The Women Organizing for Justice program, which provides training to increase the leadership and organizing skills of women with histories of incarceration.
Primary Location	Downtown Los Angeles
Website	http://www.anewwayoflife.org
Contact Details	info@anewwayoflife.org
2. Actors’ Gang Prison Theater Project	
Background and Objectives	The Actor’s Gang strives to strengthen communities through the medium of theater in form of productions, education and outreach programs. It was founded in 1981 and aims to unlock human potential in the interest of effective rehabilitation. The Prison Project fosters tolerance and nonviolent expression across racial lines with the hopes of reducing in-prison violence, increasing self-esteem and tolerance, and reducing recidivism.
Additional Information (including resources/services offered where applicable)	The Actors’ Gang conducts the following art and theater programs: <ol style="list-style-type: none"> 1. Weekly and seven-day intensive programs inside the California prison system; 2. Programs in juvenile facilities; and 3. A weekly reentry program in the community. <p>The Actor’s Gang will soon be establishing a program designed for correctional officers.</p>
Primary Location	Los Angeles
Secondary Location(s)	Greater California Area
Website	http://www.theactorsgang.com
Contact Details	prisonproject@theactorsgang.com
3. The Anti-Recidivism Coalition (ARC)	
Background and Objectives	ARC was founded in 2013 and started off offering writing classes inside Barry J. Nidorf Juvenile Hall. ARC then began an annual camping trip bringing together formerly incarcerated young people with positive mentors to offer encouragement, guidance, and resources. It has grown into a movement of formerly incarcerated individuals, advocates, and allies committed to transforming the justice system and improving reentry outcomes.
Additional Information (including resources/services offered where applicable)	ARC offers the following reentry services: <ol style="list-style-type: none"> 1. Male and female youth offender parole workshops; 2. Peer mentorship programming at Barry J. Nidorf Juvenile Hall and adult prisons; 3. ARC/Prison University Project college programs in California State Prison, Corcoran and California Substance Abuse Treatment Facility and State Prison; 4. Counseling services in the form of one-on-one counseling sessions, group programming, and life coaches to connect members to a range of services and resources, including legal support, identification, public benefits and transportation needs; 5. Mentoring; 6. Ride home program where ARC members provide a ride home from prison upon release; 7. Housing, transitional services, and educational support to ARC members next to the Los Angeles Mission College campus in Sylmar, CA; and 8. Policy advocacy.

Appendix B—Reentry Resource Guide

Primary Location	Los Angeles
Secondary Location(s)	Greater California Area
Website	www.antirecidivism.org
Contact Details	info@antirecidivism.org

4. Federal Interagency Reentry Council

Background and Objectives	<p>The Federal Interagency Reentry Council was established by Attorney General Eric Holder in 2011 and represents a commitment by the executive branch to coordinating reentry efforts and advancing effective reentry policies. It consists of 20 federal agencies and is premised on the recognition that many federal agencies have a major stake in prisoner reentry. Its mission is to:</p> <ol style="list-style-type: none"> 1. Make communities safer by reducing recidivism and victimization; 2. Assist those who return from prison and jail in becoming productive citizens; and 3. Save taxpayer dollars by lowering the direct and collateral costs of incarceration.
Additional Information (including resources/services offered where applicable)	<p>A chief focus of the Reentry Council is to remove federal barriers to successful reentry for formerly incarcerated individuals. The Reentry Council agencies are taking concrete steps towards reducing recidivism and high correctional costs but also improving public health, child welfare, employment, education, housing and other key reintegration outcomes. The Reentry Council has thus far:</p> <ol style="list-style-type: none"> 1. Enacted policy changes that reduce post-prison barriers to employment, education, healthcare, and housing; 2. Built on groundbreaking research, such as a federally-funded correctional education study, by expanding correctional education resources and reentry programs; 3. Developed new systems, such as the Veterans Reentry Search Service (VRSS), that quickly and systematically identifies incarcerated individuals with a record of military service so that reentry planning and connection to the Department of Veterans Affairs' services can begin early; 4. Increased access to healthcare coverage and treatment for justice-involved populations who disproportionately experience mental health and substance abuse health problems. 5. Started to address the widespread issues resulting from a minor or erroneous criminal record; 6. Raised public awareness; 7. Created direct and centralized access to critical information that is often hard to find via dedicated reentry webpages on existing federal websites; and 8. Established new positions to support and institutionalize reentry efforts.
Primary Location	N/A
Secondary Location(s)	N/A
Website	<p>https://csgjusticecenter.org/nrrc/projects/firc/</p> <p>https://www.justice.gov/reentry/federal-interagency-reentry-council</p>
Contact Details	N/A

5. California New Employment Credit

Background and Objectives	<p>The New Employment Credit (NEC) is available for each taxable year beginning on or after January 1, 2014, and before January 1, 2021, to a qualified taxpayer that hires a qualified full-time employee on or after January 1, 2014, and pays or incurs qualified wages attributable to work performed by the qualified full-time employee within a designated census tract or economic development area ("DGA"), and that receives a tentative credit reservation for that qualified full-time employee. In addition, an annual certification of employment is required with respect to each qualified full-time employee hired in a previous taxable year. In order to be allowed a credit, the qualified taxpayer must have a net increase in the total number of full-time employees in California.</p>
Additional Information (including resources/services offered where applicable)	<p>In order to qualify for the NEC, a business must be located in a DGA consisting of:</p> <ol style="list-style-type: none"> 1. designated census tracts with the highest unemployment and highest poverty rates in the state; 2. former Local Agency Military Base Recovery Area boundary areas, and 3. boundary areas formerly covered by the Enterprise Zone (with certain areas excluded). <p>A qualified individual is a full-time employee performing at least 50 percent of his or her services in the DGA and satisfying at least one of the following five criteria prior to employment:</p> <ol style="list-style-type: none"> 1. unemployed for the six months immediately preceding hire (twelve months preceding hire if just completed a degree or course of study); 2. veteran separated from the US Armed Forces in the preceding twelve months; 3. recipient of the Earned Income Tax Credit in the previous taxable year; 4. a person formerly convicted of a felony; and 5. current recipient of CalWORKS or general assistance.

Additional Information (including resources/services offered where applicable)	The program excludes certain industries and businesses from eligibility for benefits. Excluded businesses include temporary help services, retail trades, food services, theater companies and dinner theaters, drinking establishments (alcoholic beverages), casinos and casino hotels, and sexually-oriented businesses. However, these excluded businesses may qualify for credits if they are considered a small business.
Primary Location	N/A
Secondary Location(s)	N/A
Website	N/A
Contact Details	N/A

6. California Prison Industry Authority (CALPIA)

Background and Objectives	<p>CALPIA was created as a semiautonomous state agency to operate California’s prison industries in a manner similar to private industry. CALPIA was established to:</p> <ol style="list-style-type: none"> 1. develop and operate manufacturing, agricultural, and service enterprises that provide work opportunities for incarcerated people under the jurisdiction of the Department of Corrections and Rehabilitation; 2. create and maintain working conditions within enterprises, as much like those which prevail in private industry as possible, to assure incarcerated people assigned therein the opportunity to work productively, to earn funds, and to acquire or improve effective work habits or occupational skills; and 3. operate work programs for offenders that are self-supporting through the generation of sufficient funds from the sale of products and services to pay all its expenses, thereby avoiding the cost of alternative inmate programming by California Department of Corrections and Rehabilitation.
Additional Information (including resources/services offered where applicable)	<p>CALPIA provides work assignments for approximately 7,000 incarcerated people and operates over a hundred services?, manufacturing and consumable factories at thirty-four prisons throughout California. CALPIA’s industries produce over 1,400 goods and services including: office furniture, clothing, food products, shoes, printing services, signs, binders, eye wear, gloves, license plates, cell equipment, and much more. It is overseen by the Prison Industry Board (“PIB”) which sets general policy for CALPIA, oversees the performance of existing CALPIA industries, determines which new industries shall be established, approves its annual plan, and appoints and monitors the performance of the General Manager. The Board also serves as a public hearing body charged with ensuring that CALPIA enterprises do not create a substantial adverse impact on California industry.</p> <p>CALPIA has also established the following programs:</p> <ol style="list-style-type: none"> 1. Industry Employment Program which aims to enhance the ability of incarcerated people to obtain private sector jobs upon their release from prison. The program documents and certifies an incarcerated person’s skills, work experience, and positive work habits acquired while assigned to CALPIA’s enterprises; 2. Transition to Employment Program which assists in facilitating CALPIA workers’ successful reentry back into the community. This program assists incarcerated persons in obtaining required documents for employment and provides transitional services needed to find employment upon parole. It also assists incarcerated persons by arranging DMV appointments to help them obtain a California driver’s license or identification card, provides Social Security Administration information, and assists incarcerated persons in utilizing the America’s Job Center of California; and 3. Accredited Certification Programs offered by various organizations and agencies such as the American Welding Society the Electronics Technicians Association.
Primary Location	California
Secondary Location(s)	N/A
Website	http://pia.ca.gov/
Contact Details	Michele.Kane@calpia.ca.gov

7. California Training Benefits Program (CTB)

Background and Objectives	The California Training Benefits Program allows eligible California Unemployment Insurance (“UI”) claimants, who lack competitive job skills to be more competitive in the California labor market and receive their UI benefits while attending a training or retraining program.
Additional Information (including resources/services offered where applicable)	<p>To be considered for the CTB program participation, the following process should be followed:</p> <ol style="list-style-type: none"> 1. An individual eligible to receive California UI benefits must notify the California Employment Development Department (“EDD”) as soon as the school or training attendance begins; 2. Once the EDD has been notified, eligibility fact-finding is conducted by the EDD staff to gather information to determine if the CTB can be approved. There are two types of CTB program approval criteria the EDD uses to determine CTB eligibility.

Appendix B—Reentry Resource Guide

Additional Information (including resources/services offered where applicable)	<ul style="list-style-type: none"> a. Criterion 1: The CTB participation may be approved assuming all other UI eligibility criteria are met and the EDD determines the training meets at least one of the following conditions: <ul style="list-style-type: none"> i. the training is authorized and verifiable by certain state or federal program sponsors, ii. the individual is an active journey level union member taking industry-related training approved by his/her union, iii. the training program and provider are listed on California’s Eligible Training Provider List; or iv. the individual is in a program for math, science, or special education single-subject teaching credential, K-12, approved by the California Commission on Teaching Credentialing; and started within three years of layoff from a permanent or probationary teaching position with a public school employer. v. the individual is in a program for math, science, or special education single-subject teaching credential, K-12, approved by the California Commission on Teaching Credentialing; and started within three years of layoff from a permanent or probationary teaching position with a public school employer. b. Criterion 2: Individuals not approved under Criterion 1 may have their CTB participation approved only if he/she meets all other UI eligibility criteria and the EDD determines the training meets all of the following conditions: <ul style="list-style-type: none"> i. the individual must be eligible for California UI benefits and be unemployed or partially unemployed for four or more continuous weeks or is unemployed due to a plant closure, or substantial reduction in work force, or due to a mental or physical disability preventing the use of existing job skills, or due to technological changes in their occupation; ii. the individual must be unemployed due to a lack of demand for his/her current skills in his/her local labor market, or his/her occupation is seasonal and he/she has no other skills in current demand; iii. the training must relate to an occupation or skill which is in demand in the local labor market in California where the individual intends to seek work; iv. the training is taken at an approved training facility and is completed within a reasonable period of time, not exceeding 24 months (or not exceeding 48 months when federal extensions are in effect in California); v. the training is full time, and intended to provide skills to obtain employment in a demand occupation; vi. the individual must reasonably be expected to complete the training successfully, even if UI benefits are not sufficient to cover the entire period of training; vii. the beginning date of the new training or retraining must be more than three years from the beginning date of the last CTB participation.
Primary Location	N/A
Secondary Location(s)	N/A
Website	www.edd.ca.gov
Contact Details	N/A

8. Californians for Safety and Justice (CSJ)

Background and Objectives	Californians for Safety and Justice is a project of the Tides Center and operates as a prison advocacy non-profit organization. It works with Californians from different spaces towards a system of reducing wastage within the prison and justice system and replacing it with practical solutions, thereby building safer communities. This is done through policy advocacy, public education, partnerships, and support for local best practices.
Additional Information (including resources/services offered where applicable)	<p>Californians for Safety and Justice undertakes the following activities within the reentry landscape:</p> <ol style="list-style-type: none"> 1. a public education campaign to educate justice-involved populations about their health care options; 2. a joint partnership with the Crime and Justice Institute offering a variety of resources for pretrial and criminal justice practitioners; and 3. the creation of public education toolkits, including toolkits addressing the following: <ol style="list-style-type: none"> a. meeting the needs of women in California’s County Justice Systems, b. Contra Costa County Successes, c. the new CalRealignment.org, d. creating an effective pretrial program, e. health coverage enrollment toolkit, and f. how to assess a jail population.
Primary Location	California
Secondary Location(s)	N/A

Website	http://www.safeandjust.org/
Contact Details	info@safeandjust.org

9. Chaffey College

Background and Objectives	Chaffey College is a two-year public community college in Southern California. In 2004, Chaffey College developed an educational partnership with the California Institution for Women at Chino. The then-warden at CIW, Dawn Davison, approached Chaffey College with a desire to provide a full-service college degree program within CIW. The Chaffey program was designed to promote education as a rehabilitation measure through sustainable programming and services leading to marketable job skills. CIW students have access to a complete course pattern leading to an associate degree. In addition, all the students at CIW are eligible for Extended Opportunity Programs and Services—which covers their textbooks, materials, and tuition—and are supported by counseling services, Disability Programs and Services, and a Success Center within CIW.
Additional Information (including resources/services offered where applicable)	Chaffey College offers the following programs within CIW: <ol style="list-style-type: none"> 1. CIW associate degree program in business; and 2. One-year certification programs based on soft skills that include career development courses, interviewing technique courses, and Microsoft Office trainings.
Primary Location	California
Secondary Location(s)	N/A
Website	http://www.chaffey.edu/instructional_support/ciw.html
Contact Details	admissions@chaffey.edu

10. Cooperative of Felon Friendly Employers (CoFFE!)

Background and Objectives	The Cooperative of Felon Friendly Employers, or CoFFE!, is an organization dedicated to helping incarcerated people with felonies as they leave prison and begin to build new lives. CoFFE! was introduced in 2010 at the Defendant/Offender Workforce Development Conference, sponsored by the National Career Development Association. It maintains a nationwide database of employers who are willing to hire formerly incarcerated people with felonies.
Additional Information (including resources/services offered where applicable)	The CoFFE! Database is managed by Next Step and is used by federal and state agencies to help people with criminal records find jobs. It provides a forum where incarcerated people with felonies; employers; and federal and state agencies that supervise and assist ex-offenders in finding a job are digitally matched based upon work history, skills, industry types, and location using geo-coding technology. Employers are also incentivized as prospective employees are eligible for the Work Opportunity Tax Credit. Incarcerated people can enroll in the Database by filling out an online form to receive leads to the database of employers upon release.
Primary Location	Online platform
Secondary Location(s)	N/A
Website	https://www.thenextstep99.com
Contact Details	support@thenextstep99.com

11. Dress for Success

Background and Objectives	Dress for Success was started in 1997 and its mission is to empower women to achieve economic independence by providing a network of support, professional attire and the development tools to help women thrive in work and in life.
Additional Information (including resources/services offered where applicable)	Dress for Success has the following programs: <ol style="list-style-type: none"> 1. Suiting—Once women have scheduled an interview, they obtain a referral to visit their local 'Dress for Success' boutique, where volunteers work with them to help choose an interview outfit and provide guidance and support for their upcoming interviews; 2. Career center and job training—These programs assist women in addressing and eliminating obstacles that may arise during the search for employment. Women meet regularly to support and encourage each other through confidence-building, networking, and workplace-related discussions; 3. Career advancement—Support and assistance is offered to women striving towards their professional and personal goals through financial planning; 4. Leadership—Women are taught to initiate social change through a leadership program; and <p>Employment retention—Women are taught strategies to nurture their professional growth and remain employed.</p>

Appendix B—Reentry Resource Guide

Primary Location	New York City
Secondary Location(s)	Available across the world
Website	https://www.dressforsuccess.org/
Contact Details	worldwide@dressforsuccess.org

12. Housing Authority of the City of Los Angeles (HACLA)

Background and Objectives	HACLA was established in 1938 by City of Los Angeles Resolution No. 1241. HACLA's strategic mission is to preserve its existing affordable housing supply of 75,400 units and, through a collaborative effort, increase the supply of affordable housing in LA by 30,000 units within the next 10 years. HACLA will collaborate with residents, the public, non-profits, and private entities to create viable, healthy communities.
Additional Information (including resources/services offered where applicable)	HACLA has established a number of programs, including the following housing programs: <ol style="list-style-type: none"> 1. Public Housing Program: HACLA manages 14 large public housing locations throughout Los Angeles. The Public Housing Program provides affordable housing to families with very low income in Los Angeles. A resident's rent in the public housing program is subsidized by the federal government; and 2. Section 8 Housing Program: This program is financed by the U.S. Department of Housing and Urban Development to provide rent subsidies in the form of housing assistance payments to private landlords on behalf of low-income individuals/families, senior citizens, and persons with disabilities.
Primary Location	Los Angeles
Secondary Location(s)	N/A
Website	www.hacla.org
Contact Details	(213) 252-2500

13. InsideOUT Writers/Alumni Program (IOW)

Background and Objectives	IOW was founded in 1996 by Sister Janet Harris, a juvenile hall chaplain, and Duane Noriyuki, a former Los Angeles Times journalist, to teach creative writing to youth incarcerated in Los Angeles County's Central Juvenile Hall. The aim is to use creative writing as a catalyst for personal transformation and to empower young people with the knowledge and skills necessary to successfully reintegrate into their communities. IOW expanded to include comprehensive reentry programs and services to support former creative writing students following release.
Additional Information (including resources/services offered where applicable)	IOW runs the following programs: <p>During incarceration: A creative writing program offered at various incarceration facilities, consisting of the following components:</p> <ol style="list-style-type: none"> 1. Creative writing classes; 2. The In Depth Literary Journal consisting of compilations of creative writing pieces; and 3. Writers' retreats held at the various incarceration facilities. <p>Following release: InsideOUT Writers established the Alumni Program to transition and support former writing program students with the following components:</p> <ol style="list-style-type: none"> 1. Case management; 2. A mentoring program; 3. Writing circles; 4. Life skills enrichment sessions; 5. Community engagement; and 6. Cultural events and field trips
Primary Location	Los Angeles
Secondary Location(s)	N/A
Website	http://www.insideoutwriters.org/
Contact Details	info@insideoutwriters.org alumni@insideoutwriters.org

14. Legal Aid Foundation of Los Angeles (LAFLA)

Background and Objectives	LAFLA was established in 1929 and provides equal justice and civil legal aid to poor and low-income people in greater Los Angeles. Their mission is to change lives through direct representation, systemic change, and community education.
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Additional Information (including resources/services offered where applicable)	<p>LAFLA's team of attorneys, paralegals, and support staff work with the community in a variety of ways including: (1) providing direct representation; (2) offering counsel and advice; (3) providing referrals; and (4) educating the community about their legal rights through workshops and seminars.</p> <p>LAFLA's legal priorities consist of: (1) supporting families; (2) preserving quality, affordable housing; (3) maintaining economic stability; (4) promoting safety, security and health; (5) serving populations with special vulnerabilities; and (6) protecting human and civil rights.</p> <p>LAFLA provides services in the following areas: employment, employment barriers, and expungement services; evictions; family law; government benefits; housing and community economic development; immigration; medical-legal partnerships; student loan issues; and veteran-related matters.</p>
Primary Location	Crenshaw, East Los Angeles, South Los Angeles, Santa Monica and Long Beach
Secondary Location(s)	Greater Los Angeles
Website	https://lafla.org
Contact Details	800-399-4529

15. The Los Angeles Area Chamber of Commerce

Background and Objectives	The Los Angeles Chamber of Commerce (the "Chamber") was established in 1888 in order to attract new business to California. Its mission has evolved into improving the economic prosperity and quality of life in the Los Angeles region.
Additional Information (including resources/services offered where applicable)	<p>In order to fulfill its mission, the Chamber has established a number of programs within the following areas: (1) Professional Development; (2) Business Development; (3) Global Initiatives; (4) Innovation & Technology; (5) Education & Workforce Development; and (6) Leadership Development.</p> <p>As part of its Education & Workforce Development, the Chamber has established UNITE-LA, a non-profit organization that leads collaborative education reform efforts, promotes business-education partnerships, expands college access and provides workforce development for Los Angeles youth, especially underserved youth (including those that have been previously incarcerated).</p>
Primary Location	Los Angeles
Secondary Location(s)	N/A
Website	www.lachamber.com
Contact Details	info@lachamber.com

16. Los Angeles Human Right to Housing Collective (LAHRHC)

Background and Objectives	LAHRHC is a collective of organizations whose mission it is to build a city-wide tenants' movement and create a network of resident-led organizations and committees that can build power to implement the principle of the human right to housing in Los Angeles housing policies. This is done mainly through public education and community organizing.
Additional Information (including resources/services offered where applicable)	<p>The following organizations are active members of LAHRHC: LA Community Action Network, LA Anti-Eviction Campaign, Legal Aid Foundation of Los Angeles, People Organized for Westside Renewal ("POWER"), Unión de Vecinos, and Women Organizing Resources Knowledge and Services ("WORKS").</p> <p>The following are supporting organizations: Bus Riders Union, Homeless Health Care Los Angeles, Housing Long Beach, IDEPSCA, National Economic and Social Rights Initiative, National Law Center on Homelessness and Poverty, South Asian Network, Stop LAPD Spying Coalition, T.R.U.S.T. South LA, Western Regional Advocacy Project (WRAP), and Youth Justice Coalition.</p>
Primary Location	Los Angeles
Secondary Location(s)	N/A
Website	www.lahumanrighttohousing.org
Contact Details	lahumanrighttohousing@gmail.com

17. Los Angeles Regional Initiative for Social Enterprise (LA:RISE)

Background and Objectives	<p>LA:RISE is a five-year project, established in 2015, that is led by the City of Los Angeles Workforce Investment Board and the City of Los Angeles Economic and Workforce Development Department in partnership with Roberts Enterprise Development Fund. It is designed to help those who find it difficult to find employment, such as individuals with a history of homelessness or incarceration and disconnected youth, obtain long-term work.</p> <p>As part of the initiative, LA:RISE creates an employer-driven pathway that integrates public, private, non-profit, and educational systems to support the abovementioned individuals gain employment.</p>
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Appendix B—Reentry Resource Guide

Additional Information (including resources/services offered where applicable)	<p>LA:RISE project goals are to:</p> <ol style="list-style-type: none"> 1. Increase sustained employment for job seekers with significant barriers to employment, while reducing turnover costs for employers; 2. Complement high-quality, standardized, evidence-based workforce training with personal and professional support services; and 3. Integrate employment Social Enterprises and specialized service providers with the Workforce Development System to create stronger employment results. <p>LA:RISE consists of four main components:</p> <ol style="list-style-type: none"> 1. Transitional Social Enterprise Jobs—Time-bound, subsidized employment opportunities are created in a supportive work environment. Personal support in the form of case management and job readiness assessments are also provided; 2. Bridge Jobs—Jobs are provided by employers who are willing to hire employees with non-traditional backgrounds and are committed to creating a supportive and inclusive work culture where they can thrive. These jobs are subsidized and are only provided to a select group of transitional graduates; 3. Training Services—Individuals are co-enrolled in job placement and career and training services throughout this initiative. These services include vocational workshops, financial and computer literacy, and soft skills development, including resume building, interviewing techniques, and conflict resolution; and 4. Supportive Services—Personal support is provided in the form of case management, healthcare, childcare, etc. to help participants stabilize their lives and improve their ability to keep a job.
Primary Location	Los Angeles
Secondary Location(s)	N/A
Website	http://wiblacity.org/ewddLacity/index.php/employment-services/la-rise
Contact Details	213-744-7300

18. Neighborhood Legal Services of Los Angeles County (NLSLA)

Background and objectives	NLSLA is a steadfast advocate for individuals, families, and communities throughout Los Angeles County. The services it provides are a combination of individual representation, high impact litigation, and public policy advocacy. NLSLA combats the immediate and long-lasting effects of poverty and expands access to health, opportunity, and justice in Los Angeles’s diverse neighborhoods.
Additional information (including resources/services offered where applicable)	<p>NLSLA provides legal services in the following areas:</p> <ol style="list-style-type: none"> 1. Housing—Assistance with unlawful evictions and foreclosures and fighting discrimination in Section 8 and other government-subsidized housing; 2. Health—Leads a network of programs offering free assistance to people struggling to get coverage and resolve problems with health plans; identifies widespread health access issues that need to be addressed on a policy level; and ensures implementation of the Affordable Care Act is meaningful for the most impacted communities in Los Angeles; 3. Economic security—Assists in working to mitigate the effects of poverty and create opportunities for individuals and families to attain financial stability; helps remove barriers to education and employment; protect and resolve family relationships; and ensure access to safety-net public benefits; and 4. Legal assistance—Assists survivors of domestic violence; providing services in relation to Proposition 47 and expungements.
Primary Location	Glendale, California Pacoima, California El Monte, California
Secondary Location(s)	N/A
Website	www.nlsla.org
Contact Details	800-433-6251

19. Occidental College

Background and Objectives	Occidental College is a private, co-educational liberal arts college located in the Eagle Rock neighborhood of Los Angeles, California.
Additional Information (including resources/services offered where applicable)	<p>Occidental College has established the following programs:</p> <ol style="list-style-type: none"> 1. Prison Education Project where students travel to the Norco, CA Rehabilitation Center to discuss college and other institutions of higher education with currently incarcerated men; and 2. Prison Beautification Club at the Norco, CA Rehabilitation Center.
Primary Location	Los Angeles

Secondary Location(s)	N/A
Website	www.oxy.edu
Contact Details	admission@oxy.edu

20. Weingart Center for the Homeless

Background and Objectives	The Weingart Center is a non-profit organization established in 1983 in response to the widespread homelessness facing Los Angeles. Their objectives are to empower and transform people's lives by providing solutions to combat poverty and homelessness.
Additional Information (including resources/services offered where applicable)	<p>The Weingart Center has established the following programs:</p> <ol style="list-style-type: none"> 1. 'Veterans Transitional Housing'—This program offers housing to veterans for up to two years, case management services in the form of finding employment, family reunification, Life Skills classes, and other clinical services; 2. Community Re-Entry Programs, EPIC, and AB109—EPIC is a six-month residential program for people on parole to adjust to life following release from incarceration. AB109 provides employment and temporary housing services for individuals released from state prisons to Los Angeles County Probation supervision under AB 109; 3. Open Door—This program provides short-term housing for 90 days or less for people who are homeless and meet certain eligibility criteria; 4. AmeriCorps Hope for Homeless—Hope for the Homeless is an AmeriCorps national service project that recruits members from graduates of Skid Row programs to conduct street outreach and assist organizations on Skid Row in helping clients; 5. GROW—The GROW program provides employment and training services to people receiving General Relief) to help them obtain a permanent job and become self-sufficient. GROW features a short-term, intensive job preparedness and employment search curriculum; 6. Hope Row Resource Center—The Hope Row Resource Center is a walk-in location where clients can receive case management, hygiene supplies, mail drop services, community voice mail, referrals to programs, or other supportive services. The Resource Center acts as a front door to residential programs, as well as a link with partner organizations throughout the community; and 7. Workforce Development Program—This program is aimed at employment development. The workforce development program begins with a comprehensive assessment of skills and abilities. Members of the program then enroll in a three-week Job Club class which addresses resume and cover letter development, interview etiquette, grooming and hygiene, and customer service skills.
Primary Location	Downtown Los Angeles
Secondary Location(s)	N/A
Website	http://weingart.org/about-us/contact/
Contact Details	Yvette@weingart.org

21. WorkSource Centers

Background and Objectives	WorkSource California is a collaborative effort between multiple local Workforce Investment Areas within the County of Los Angeles, as well as Los Angeles County Department of Public Social Services/GAIN, Los Angeles Economic Development Corporation, and the California Employment Development Department. WorkSource California has set up WorkSource Centers across the state that operate as entry points to all the LA County WorkSource services. These are full-service career centers located in almost every community throughout the County that offer comprehensive employment and hiring services to workers, employers, and job seekers at no charge.
Additional Information (including resources/services offered where applicable)	<p>WorkSource Centers provide access to the following:</p> <ol style="list-style-type: none"> 1. Provision of employment services to adults and youths; 2. Provision of workforce and business development resources, including preliminary skill assessments, information about local education and training providers, current labor market information, and help with filing claims for unemployment insurance; and 3. More intensive services in the form of personalized employment plans and individual counselling programs.
Primary Location	Los Angeles County
Secondary Location(s)	N/A
Website	www.worksourcecalifornia.com/centers
Contact Details	AJCCJobs@css.lacounty.gov

