

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

NATIONAL LAW CENTER ON)
HOMELESSNESS & POVERTY,)
))
Plaintiff,)
))
v.)
))
UNITED STATES DEPARTMENT OF)
HOUSING AND URBAN)
DEVELOPMENT,)
))
Defendant.)
_____)

C.A. No. 18-cv-00998 (APM)

DECLARATION OF ERIC S. TARS

I, Eric S. Tars, declare as follows:

1. I am the legal director at the National Law Center on Homelessness & Poverty (NLCHP), where I have worked since 2006. The statements in this declaration are based on my personal knowledge.

2. NLCHP is a national nonprofit dedicated to ending and preventing homelessness. Established in 1989, it works to expand access to affordable housing, meet the needs of those who are homeless or at risk of being so, and strengthen the social safety-net through policy advocacy, public education, advocacy training, and other mechanisms.

3. NLCHP has long sought to combat the “criminalization of homelessness”: measures that punish people for behaviors such as eating, sleeping, and sheltering oneself in public, despite the lack of alternatives.

4. For many years, as part of NLCHP’s work in this area, I led an effort to convince the Department of Housing and Urban Development (HUD) to add a question about entities’ efforts to end and prevent the criminalization of homelessness to the Continuum of Care (CoC)

application that HUD uses in its annual CoC program competition. My colleagues and I viewed this measure as an important part of NLCHP's campaign against the criminalization of homelessness because, as I learned through my work, the questions that HUD places on its CoC application and its related scoring criteria can encourage CoCs and their partners to adopt certain strategies, in order to increase their scores and their chances of receiving CoC program funding.

5. In its Notice of Funding Availability for the 2015 CoC program competition, HUD addressed the criminalization of homelessness in the agency's CoC scoring criteria for the first time. The next year, HUD's Notice of Funding Availability for the CoC program competition again addressed the topic.

6. My colleagues and I sought to build on these developments to further NLCHP's campaign against the criminalization of homelessness. Through a Freedom of Information Act (FOIA) request that NLCHP mailed to HUD on or about May 8, 2017, NLCHP sought records that would show how CoCs responded to HUD's mention of the criminalization of homelessness in the 2015 and 2016 CoC Notices of Funding Availability, and how HUD scored CoCs' related responses on their applications. A true and correct copy of NLCHP's May 8, 2017 FOIA request is attached to this declaration as Exhibit A.

7. With the requested records, NLCHP hoped to assess the impact of HUD's new attention to the topic of criminalization. For instance, the records would enable NLCHP to learn how HUD had applied the addition to the Notice of Funding Availability and evaluate whether it had persuaded local communities to take additional steps against the criminalization of homelessness and to otherwise address the needs of homeless families and individuals. Additionally, NLCHP planned to share the information it learned with CoCs. NLCHP hoped that by helping CoCs learn about others' strategies and the points that HUD had awarded them for their

work, NLCHP could show more about how HUD had valued such efforts and inspire CoCs to take even more action to combat the criminalization of homelessness.

8. On June 22, 2017, when NLCHP had not received a response to its May 2017 FOIA request, I sent an email to a representative of HUD's FOIA Branch, attaching a copy of the request and seeking information on its status. I did not receive a response to this email.

9. On or about September 13, 2017, when NLCHP still had not received a response to its FOIA request, I mailed a letter to HUD's FOIA office. The letter included the request as an attachment and sought a response to it. This September 13, 2017, letter was not a new FOIA request.

10. On September 22, 2017, I received an email from a representative of HUD's FOIA Branch that acknowledged NLCHP's FOIA request.

11. By letter dated September 26, 2017, HUD again acknowledged NLCHP's FOIA request, but erroneously stated that it was dated September 13, 2017.

12. By letter dated October 2, 2017, HUD denied NLCHP's fee waiver request.

13. On October 31, 2017, NLCHP appealed HUD's denial of its fee waiver request.

14. By letter dated December 5, 2017, HUD affirmed its denial of NLCHP's fee waiver request.

15. When NLCHP filed suit against HUD on April 27, 2018, NLCHP still had not received a substantive response to its May 2017 FOIA request.

16. On June 27, 2018, I received an email from HUD with three attachments: a cover letter and two PDF documents containing charts. The charts included material responsive to the first two parts of NLCHP's FOIA request, regarding responses to portions of the 2015 and 2016 CoC Notices of Funding Availability. The document title of the first chart is "2015 CoC

Responses.” From that title and the column labels, I understand that this chart contains CoCs’ responses to question 3A-7 on the 2015 CoC application. The chart also includes a column titled “Score” whose content is redacted. From the document format, I understand each redacted “score” to correspond to the CoC and the CoC response that are listed in the same row. Attached as Exhibit B to this declaration is a true and correct copy of the first page of that document. The remaining pages in the document use the same format (including redactions) as this first page, except that the other pages do not repeat the column headings.

17. The document title of the second chart that I received on June 27, 2018 is “2016 CoC Responses.” From its content, I understand that this chart contains CoCs’ multi-part responses to one question on the 2016 CoC application. The chart also includes a column titled “Score” whose content is redacted. From the document format, I understand each redacted “score” to correspond to the CoC and the CoC response that are listed in the same row. Attached as Exhibit C to this declaration is a true and correct copy of the first page of that document, rotated to be a vertical document. The remaining pages in the document use the same format (including redactions) as this first page, except that the other pages do not repeat the column headings.

18. Based on my knowledge of the CoC application, I concluded that the documents that HUD sent me in June 2018 included only some of the CoC responses that the first part of NLCHP’s FOIA request sought. Through counsel, NLCHP expressed its concern to HUD, and HUD agreed to search for and produce additional responsive documents.

19. On September 26, 2018, HUD sent me an email with two attachments: a cover letter and an Excel spreadsheet of additional material responsive to the first part of NLCHP’s FOIA request. Later that day, HUD sent me another email with the same two attachments, plus a PDF document. The second email explained that HUD provided the Excel spreadsheet as a courtesy

because certain text was cut off in the PDF document. Attached as Exhibit D to this declaration is the first page of the PDF document. The first 12 pages of the PDF document use the same format as this attached page, except that the other pages do not repeat the column headings. From the material that HUD provided, I understand that these 12 pages contain each CoC's multi-part response to question 1C-6 on the 2015 CoC application; the CoC that provided the relevant response is identified by its number. Attached as Exhibit E to this declaration is page 13 of the PDF document. The last five pages of the PDF document use the same format as this attached page, except that the other pages do not repeat the column headings. From the material that HUD provided, I understand that these five pages contain each CoC's multi-part response to question 4B-3 on the 2015 CoC application; the CoC that provided the relevant response is identified by its number.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2019.

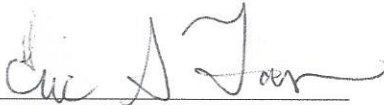

Eric S. Tars

EXHIBIT A

NATIONAL LAW CENTER ON HOMELESSNESS & POVERTY

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Maria Foscarinis
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Executive Director

*Affiliations for identification
purposes only*

Freida B. Edwards
Department of Housing & Urban Development
Freedom of Information Act Office
451 Seventh Street, S.W., Room 10139
Washington, D.C. 20410

Re: Freedom of Information Act Request

May 8, 2017

Dear Ms. Edwards:

We hereby request, pursuant to the Freedom of Information Act, 5 USC § 552, as amended (FOIA), a copy of or all documents in the possession of the Department of Housing and Urban Development (HUD), as set forth below:

1. All responses by funding applicants to Community Planning and Development's Notice of Funding Availability for the 2015 Continuum of Care program Competition (FR-5900-N-25) in response to *Section VII.A.1.j. Outreach*, found on page 45 of the NOFA, which reads as follows:

Outreach. Up to 2 points to CoCs that demonstrate recipients have implemented specific strategies that prevent criminalization of homelessness, affirmatively further fair housing as detailed in 24 CFR 578.93(c), and ensure that outreach is conducted to homeless individuals and families who are least likely to request housing or services in the absence of special outreach. Maximum points will be awarded to CoCs that provide information that demonstrates that 100 percent of the geographic area is covered by the strategies and that describes the specific outreach procedures in place that are used by the homeless service organizations to identify and engage homeless individuals and families, including their efforts to provide meaningful outreach to persons with disabilities and persons with limited English proficiency. Applicants must describe how they are reducing criminalization of homelessness and the procedures they will use to market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach.

2000 M Street, N.W., Suite 210, WASHINGTON, DC 20036 | www.nlchp.org | PHONE: 202.638.2535 | FAX: 202.628.2737

The National Law Center on Homelessness & Poverty is a 501(c)3 charitable organization. Its federal tax ID is 52-1633883. No goods or services were given in exchange for this gift. Your donation is tax-deductible to the extent of the law. Please retain this letter for your records as your official receipt.

2. All responses by funding applicants to Community Planning and Development's Notice of Funding Availability for the 2016 Continuum of Care program Competition (FR-6000-N-25) in response to *Section VII.A.1.i. Criminalization*, found on page 35 of the NOFA, which reads as follows:

Criminalization. Up to 2 points to CoCs that implemented specific strategies to prevent criminalization of homelessness within the CoC's geographic area. Maximum points will be awarded to CoCs that indicate specific strategies to ensure homelessness in not criminalized such as engaging or educating local policy makers, engaging or educating law enforcement, implementing community plans, or engaging or educating businesses.

3. The points awarded by HUD to each applicant's corresponding responses to each of the above questions (*Section VII.A.1.j. Outreach* of the 2015 NOFA and *Section VII.A.1.i. Criminalization* of the 2016 NOFA).

NLCHP seeks a fee waiver under 5 U.S.C. § 522(a)(4)(A)(iii) and 24 C.F.R. § 15.110(h). NLCHP is a nonprofit with a mission to use the power of the law to advocate for the legal rights of homeless and economically vulnerable Americans. The organization advocates for families and individuals that need access to housing, ensure homeless children have access to school, and protect the human and civil rights and dignity of all. *See* 24 C.F.R. § 15.110(h)(2) (fee waiver appropriate when information is not primarily in the commercial interest of the requester). NLCHP is an "other use requester". Under HUD's FOIA regulations, all "other" requesters are eligible for fee waivers if the disclosure is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the Federal Government. 24 C.F.R. § 15.110(h). As such, HUD should not charge NLCHP for professional search time or programming services. In addition, NLCHP is willing to receive all documents electronically so as to avoid any estimated copy charges.

Disclosure of the requested information is in the public interest and not for commercial use. *See* 24 C.F.R. § 15.110(h)(1)(i)-(ii). The information will be used to contribute to public understanding of the operations or activities of the government. *See* 24 C.F.R. § 15.110(h)(1)(i)(A), (C). By incentivizing communities to take steps to end criminalization, HUD has responded to the growing pressure against the criminalization of homelessness. The requested information will reveal those strategies that HUD finds worthwhile and deserving of federal funding in responding to this critical crisis. *See* 24 C.F.R. § 15.110(h)(1)(i)(D) (the information provided will provide the public with a significant understanding); 24 C.F.R. § 15.110(h)(1)(i)(B) (the informative value of the information is consequential). We will analyze the data presented in the released documents to discover trends, valuable strategies, and possible areas of concern. *See* 24 C.F.R. § 15.110(h)(1)(i)(C). This knowledge will inform the work of advocates, educators, and litigators in championing the rights of homeless and ending criminalization, in line with broader federal policy. *See* 24 C.F.R. § 15.110(h)(1)(i)(C) (the public's understanding will be enhanced by the disclosure).

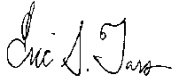
If any portion of this request is denied, we request a detailed statement of the reasons for the withholding or an index or similar statement of the nature of the documents withheld. As to those documents that may be exempt under FOIA Section 552(b), we request that HUD exercise its discretion in favor of disclosing this material. Relatedly, if HUD denies the fee waiver request, please provide the basis for the denial with an explanation of why the fee waiver request does not meet the fee waiver criteria.

If you have any questions about this request, you may contact me by telephone at (202) 638-2535 x. 120 or by email at etars@nlchp.org.

I look forward to your reply within 20 workdays (excluding Saturdays, Sundays, and legal holidays), as the statute requires.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in cursive script that reads "Eric S. Tars".

Eric S. Tars

Senior Attorney

EXHIBIT B

CoC_NUMBER_NAME	FY2015_3A_7: How does the CoCensure that all people living unsheltered in the CoC's geographic area are known to and engaged by providers and outreach teams?	Score
AK-500 - Anchorage CoC	<p>1. To engage unsheltered persons, the CoC holds a Project Homeless Connect event as part of PIT. It is widely advertised to the community. The public bus system is free on this day, increasing unsheltered persons at the event. 2. CoC partners serving the chronically homeless organize the adult unsheltered count, which begins before dawn in an effort to count encampments before people move during the day. Social service agency staff teams, with volunteers and formerly homeless individuals, target coordinated and mapped areas to count the unsheltered. Together the CoC and Anchorage Police identify active areas of unsheltered people. 3. A homeless youth count is planned by four youth-focused CoC agencies. Peer homeless youth are paired with outreach staff to get an accurate unsheltered count. Areas frequented by homeless youth (bus transit center) are targeted. All CoC youth drop-in centers participate. The CoC annually submits a grant to AMHTA for PIT support.</p>	<p>(b)(5) Deliberative Privilege</p>
AK-501 - Alaska Balance of State CoC	<p>In such a huge geography, the most efficient way for the CoC to identify and assist unsheltered persons is to organize a local response community-by-community. For example, in Fairbanks the Rescue Mission conducts campsite visits to equip service-resistant persons with items toward self hypothermia. In the Mat-Su Valley, Valley Charities, Inc. seeks out and serves the unsheltered. In Juneau, the Glory Hotel Emergency Shelter has recently hired a full-time outreach coordinator. In addition, many communities host a Project Homeless Connect (PHC) event as part of their PIT count. Unsheltered persons receive services the day of the PHC event and are connected to additional services for continued support.</p>	
AI-506 - Birmingham/Jefferson, St. Clair, Shelby Counties CoC	<p>This CoC has a general street outreach team, multiple Veterans outreach teams, a peer outreach for mental health clients, HIV-specific and Youth-specific outreach. All know one another, coordinate with and through the CoC, and utilize HMIS to share client information. As much as unsheltered people are willing, we upload pictures/ID into HMIS for physical descriptions as well. The CoC Veteran's Coordination/Outreach meets every two weeks to compare notes/brainstorm about solutions for men and women on the streets. We plan to do the same for all street dwellers starting in the next few months but need additional housing to offer. Workers generally start contact by offering hygiene necessities, water, coffee or just a handshake. As soon as trust exists, they offer shelter, housing, services - whatever the client is receptive to. They get them off the streets as soon as possible and hand the client off to long term services/housing.</p>	
AL-501 - Mobile City & County/Baldwin County CoC	<p>The community outreach team including CL outreach and PAII identify and track frequency of engagement and location of unsheltered homeless in HMIS. Outreach staff are available to engage unsheltered homeless identified by partners and the general public, when notified via phone, email or via the CoC website. The CE prioritizes referrals for unsheltered homeless individuals identified as hardest to serve using VISPDRF, length of time unsheltered and recommendations from outreach staff. The CL has an agreement with the local emergency shelters to provide dedicated beds with no limit on length of stay, in order to keep those individuals engaged while permanent housing is identified, if they cannot be placed within 74 hours.</p>	
AI-502 - Florence/Northwest Alabama CoC	<p>The CoC homeless providers have their own outreach procedures and work collaboratively to coordinate activities to engage homeless persons and families in services. Riverbend Center for Mental Health has an ACT Team that works actively to engage these individuals as well as Safeplace, which has outreach offices located in 3 counties to provide local representation and access to services. They also have advocates in each court across the 6 county service area. Projects funded by ESG funds are providing for a Street Outreach coordinator who will work throughout the entire CoC geographic area to locate unsheltered homeless persons. In addition funds were secured through Community Action Agency and local churches to help establish a soup kitchen in the more rural areas of the CoC which has been proven to be an effective outreach to engage the unsheltered homeless population.</p>	
AL-503 - Huntsville/North Alabama CoC	<p>NACH provides outreach service at our Satellite Office which is located at the Main Public Library. This is the location that several of our homeless consumers spend most of their days once required to leave the shelters. The NACH Executive Director also volunteers at a local food distribution center three nights a week to educate the consumer on NACH Homelessness Intervention and Prevention Services. The NACH Executive Director is well known by the homeless population in our community because she is available at various community events throughout the year to talk to them about NACH Services. NACH coordinates a bi-annual Homeless Consumer Meeting to discuss with the clients services and to help identify barriers that exist. Various Outreach teams visit the homeless camps throughout the week.</p>	
AI-504 - Montgomery City & County CoC	<p>In October 2017, MACI reinstated its Street Outreach program and hired a fulltime Outreach Worker. MACI was able to combine private funding with ESG funding to accomplish this goal. He canvasses areas known as homeless hot spots and widely distributes his cards for lay people and social service employees to hand out when they may encounter an unsheltered homeless person. He is also on call for the 2-1-1 Call Center to respond to requests for help. The Outreach Worker provides case management, linkage to community services, and crisis assistance to unsheltered homeless persons. He works with each client to assess their unique needs, determine appropriate housing and supportive service options, advocate on their behalf for access to services, and develop a plan to sustain the individual or family. He may serve individuals or families in need of assistance, with the goal of engaging homeless persons and connecting them with mainstream resources, shelter services and/or permanent housing.</p>	
AL-506 - Tuscaloosa City & County CoC	<p>The CoC's outreach team engages the unsheltered homeless during monthly outreach. Once the outreach team makes contact with an individual/family, they are connected with a partner agency. The CoC collaborates with local police and fire who may come into contact with unsheltered homeless. Unsheltered homeless are also a good resource to connect the team with others who are unsheltered.</p>	
AL-507 - Alabama Balance of State CoC	<p>Although, ARCH has no employee outreach workers, SSVI canvases for Veterans and when other are located, ARCH's ESG team interviews for necessary services; helps all possible; and refers to other agency who provide the appropriate services.</p>	

EXHIBIT C

FY2016_COC_NUMBER_NAME	Policymakers	law_enforcement	Implemented_plans	No_strategies	Other_1	Other_2	Other_3	Other_1_Text	Other_2_Text	Other_3_Text	Score
AK-500 - Anchorage CoC	x	x	x	x			x			<p>The Municipality of Anchorage (MOA) may post an illegal campsite with a notice stating all personal property not removed within 15 days of the date and time the notice is posted may be removed and disposed of as waste, unless sooner claimed or disposal authorized by the owner. Within 24 hours after posting the notice of campsite abatement, the MOA law enforcement official responsible for posting informs the MOA DHHs office of the notice posting and illegal campsite location. The DHHs office provides written or electronic notification to community agencies within the first work day after receipt of the notice. The community agencies provide outreach services to the homeless occupants to encourage and accommodate the transition to housing and the social service community network. At a weekly meeting, made up of representatives from MOA and the community network, the notices are reviewed for follow-up and plans about housing the homeless are developed.</p>	(b)(5) Deliberative Privilege
AK-501 - Alaska Balance of State CoC	x	x	x								
AL-500 - Birmingham/Jefferson, St. Clair, Shelby Counties CoC	x	x			x			Engaging/educating local businesses in high homeless areas			
AL-501 - Mobile City & County/Baldwin County CoC	x	x									
AL-502 - Florence/Northwest Alabama CoC	x	x									
AL-503 - Huntsville/North Alabama CoC	x	x									1 of 75

EXHIBIT D

CAC Number	Engaged/educated local p. policymakers	Engaged/educated law enforcement	Implemented community-wide plans	No. of strategies have been implemented	Other 1	Other 2	Other 3	Other 1 Name	Other 2 Name	Other 3 Name
AK-800	1	1	1	0	0	0	0			
AK-561	1	1	0	0	0	0	0			
AL-600	1	1	0	0	0	0	0			
AL-601	1	1	0	0	0	0	0			
AL-602	1	1	0	0	0	0	0			
AL-603	1	1	0	0	0	0	0			
AL-604	1	1	0	0	0	0	0			
AL-606	1	1	0	0	0	0	0			
AL-607	1	1	0	0	0	0	0			
AR-800	1	1	0	0	0	0	0			
AR-801	1	1	0	0	0	0	0			
AR-802	1	1	0	0	0	0	0			
AR-804	0	0	0	0	0	0	0			
AR-805	1	1	0	0	0	0	0			
AZ-588	0	1	0	0	1	1	1	Working relationships with county and federal probation to prevent homelessness. One sub recipient leverages the delivery of transitional shelter for federal offenders as a service to ensure individuals do not return to the streets.	Sub recipient programs are known to local Law Enforcement and probation officers will make referrals to the programs so that individuals have an alternative to being on the streets.	Some communities have SM, Drug, and Veteran Courts in place that provide an opportunity for individuals to access services and treatment without going through the criminal justice system.
AZ-581	1	1	0	0	0	0	0			
AZ-582	1	1	0	0	0	0	0			
EA-600	1	1	1	0	1	1	0	Emerging housing	Educating public and mainstream systems about what's needed to end homelessness	
CA-601	1	1	0	0	1	0	0	Continued CAC Policy and Legislative Committee meetings with SF Police Department's UCRP, and local advocates for community discussion of strategies for deinstitutionalization in SF. The Policy and Legislative Committee developed recommendations to the UCRP around decriminalization		
CA-602	1	1	0	0	1	1	0	The CAC has two PBR subsidy programs targeted to chronically homeless persons identified by law enforcement as having problematic street behavior and high volumes of contact with local police departments. Rather than getting tickets, fines or arrests, individuals are connected to street outreach and offered permanent housing. The two programs have a combined 60 subsidies distributed in Berkeley, Oakland, Hayward, Fremont and Livermore. Those housed have seen dramatic drops in law enforcement contacts since being housed.	The CAC and its providers are also active in the monthly Multi-Disciplinary Forensic Task Force convened by public transit police officers and attended by city police departments and the County Sheriff's Department as well as Mental Health Nucleus Crisis and street outreach providers. The goal of the group is to identify by name persons in crises on the streets and connect them to services and permanent housing rather than criminalizing their conduct, which is likely a result of their homeless status and/or their disability.	
CA-603	1	1	0	0	1	1	1	CAC members filed a Homeless Civil Rights complaint with the DOJ	Homeless legal clinic, community service in lieu of any penalty for camping citations	CAC coordinated monthly meeting with county & city law enforcement and DA offices on monthly basis to address hot spots and options for non-criminalization by law enforcement.
CA-604	1	1	0	0	1	0	0	Development of specific law enforcement plan. The Contra Costa County Sheriff's Office is developing a "homeless policy" based on defining relevant best practices to guide its interactions with unsheltered persons and encampments. This is informed by its partnership with street outreach in the CAC over the last year. This will result in standardizing daily procedures to assist unsheltered persons rather than start enforcement as a last resort when all other efforts to engage people in services and mitigate impacts on neighbors and the environment have been exhausted.		
CA-605	1	1	0	0	1	1	1	Implemented Homeless Court & Behavioral Health Court offering alternative sentencing	Implemented Homeless Encampment Protocol in partnership with City Flood Control	Developed Assisted Outpatient Treatment program, did court ordered treatment for SPM, preparation for special needs of homelessness
CA-606	1	1	0	0	0	0	0			
CA-607	1	1	0	0	1	0	0	Work with law enforcement to appoint mental health homeless outreach officer		
CA-608	1	1	0	0	0	0	0			
CA-609	1	1	0	0	0	0	0			
CA-610	1	1	0	0	0	0	0			
CA-611	1	1	0	0	0	0	0			
CA-612	1	1	0	0	0	0	0			
CA-613	1	1	0	0	1	0	0	Develop Alternative Programs to Balance Enforcement, such as a storage program to offset shopping cart fees		
CA-614	1	1	0	0	1	1	1	Law Enforcement Outreach Collaborative Fund, teams with law enforcement professionals were formed. An equity are the typical homeless outreach teams comprised of police officers and CAC members that which were created. Strategies and practices were developed for locating homeless individuals and engaging with them in order to make effective connections to housing and the services/housing needed. The success of this housing to give jobs as well as a large "backlog" of individuals in need of housing difficult situations with homeless individuals, a formalized housing intervention model. Established a cohort model for job, CAC, or engagement with the homeless allows to indicate the best practice by demonstrating there are needs of CAC's ways to solve homelessness issues.	Data driven decision making using CAC data from H&HC Coordinated Entry	CAC collaboration with Fresno's homeless court, Fresno's homeless court, a joint venture of the Superior Court, the District Attorney, the Public Defender and Sheriff and members of CAC treatment programs. Court orders are referred to Homeless Court by H&HC members and related agencies including Fresno's Homeless Response Mission, West Care, Spirit of Women, Salvation Army and Payne and Slonem Home. The court convenes 3-4 times a year and improves access to justice for the homeless population, who typically will not appear for court in a traditional courtroom setting. By addressing their outstanding criminal cases, barriers to employment and government services are removed. The also allows the court to issue and track jail costs by providing community services or paying credit for time served in state and city treatment programs in lieu of incarceration or fines/court costs are not able to pay. Most services are served as community service for individuals who serve the homeless. Common cases involve traffic matters, public intoxication, petty theft, trespass, driving in public, unmet in public, and grand theft. Again, this model is an
CA-615	1	1	0	0	0	0	0			
CA-616	1	1	0	0	0	0	0			
CA-617	1	1	0	0	0	0	0			
CA-618	1	1	0	0	0	0	0			
CA-619	0	1	0	0	0	0	0			
CA-620	1	1	0	0	0	0	0			
CA-621	1	1	0	0	0	0	0			
CA-622	1	1	0	0	0	0	0			
CA-623	1	1	0	0	0	0	0			
CA-624	1	1	0	0	0	0	0			
CA-625	1	1	0	0	0	0	0			
CA-626	1	1	0	0	0	0	0			
CA-627	1	1	0	0	0	0	0			
CA-628	1	1	0	0	0	0	0			
CA-629	1	1	0	0	0	0	0			
CA-630	1	1	0	0	0	0	0			
CA-631	1	1	0	0	0	0	0			
CA-632	1	1	0	0	0	0	0			
CA-633	1	1	0	0	0	0	0			
CA-634	1	1	0	0	0	0	0			
CA-635	1	1	0	0	0	0	0			
CA-636	1	1	0	0	0	0	0			
CA-637	1	1	0	0	0	0	0			
CA-638	1	1	0	0	0	0	0	Use of specially trained, dedicated law enforcement homeless intervention units teams in the three city centers	Local jurisdictions on CAC team to build relationships	CAC case (ILIC, PTT) shares with jurisdiction leadership
CA-639	1	1	0	0	0	0	0			
CA-640	1	1	0	0	0	0	0			
CA-641	1	1	0	0	0	0	0			
CA-642	1	1	0	0	0	0	0			
CA-643	1	1	0	0	0	0	0			
CA-644	1	1	0	0	0	0	0			
CA-645	1	1	0	0	0	0	0			
CA-646	1	1	0	0	0	0	0			
CA-647	1	1	0	0	0	0	0			
CA-648	1	1	0	0	0	0	0			
CA-649	1	1	0	0	0	0	0			
CA-650	1	1	0	0	0	0	0			

EXHIBIT E

CoC Number	Direct outreach and marketing	Use of phone or internet-based services like 211	Marketing in languages commonly spoken in the community	Making physical and virtual locations accessible to those with disabilities	Other 1	Other 2	Other 3	Other 1 Name	Other 2 Name	Other 3 Name
AK-500	1	1	0	1	0	0	0			
AK-501	1	1	0	1	0	0	0			
AL-500	1	1	0	1	0	0	0			
AL-501	1	1	1	1	1	0	0	Special outreach to rural areas		
AL-502	1	1	1	1	0	0	0			
AL-503	0	1	0	1	0	0	0			
AL-504	1	1	0	0	0	0	0			
AL-506	1	1	1	1	0	0	0			
AL-507	0	1	0	0	0	0	0			
AR-500	1	0	0	0	0	0	0			
AR-501	1	0	1	0	0	0	0			
AR-503	1	0	1	0	0	0	0	Street Outreach		
AR-504	1	0	0	0	0	0	0			
AR-505	1	0	1	1	0	0	0			
AZ-500	1	1	1	1	0	0	0			
AZ-501	1	1	1	1	0	0	0			
AZ-502	1	1	1	1	0	0	0			
CA-500	1	1	1	1	1	1	1	School, medical care and community agency partnerships	Coordinated Entry	Engagement with FBOs (i.e. Faith in Action, Cathedral of Faith, Salvation Army)
CA-501	1	1	1	1	1	1	0	CE for single adults uses a low-barrier, no wrong door online referral system	SF Navigation Center targeted outreach to adults with high barriers to shelter services	
CA-502	0	1	0	1	0	0	0			
CA-503	1	1	0	1	1	1	0	Access through Department of Human Assistance	Street Outreach by CoC Staff	
CA-504	1	1	1	1	0	0	0			
CA-505	1	1	1	1	1	0	0	Collaboration with local law enforcement		
CA-506	1	1	1	1	0	0	0			
CA-507	1	1	1	1	1	1	1	Special outreach to underserved populations (sanctuary crisis, Encouraging CoC funding for Programs in Underserved Geographic Areas in the CoC, developing satellite triage for coordinated entry in extremely rural communities	Access to promotional materials at community sites	Increased peer outreach
CA-508	1	1	1	1	1	0	0			
CA-509	1	1	1	0	0	0	0			
CA-510	1	1	0	0	0	0	0			
CA-511	1	1	0	1	0	0	0			
CA-512	1	1	1	1	0	0	0			
CA-513	1	1	1	1	1	1	0	Project Homeless Connect	Housing Navigator-Street	
CA-514	1	1	1	1	1	1	1	Assessment to identify populations most likely to need services, but least likely to be aware of them (i.e. FPD, etc. not aware)	Partnerships with specialized providers	Commitment of all CoC providers in 2016 to Affirmatively Further Fair Housing in conjunction with FHOCC membership
CA-515	1	1	0	0	0	0	0			
CA-516	1	1	1	1	0	0	0			
CA-517	1	0	1	1	0	0	0			
CA-518	1	1	1	1	1	0	0	increasing CoC membership to include new representatives of new populations, e.g. people with developmental disabilities		
CA-519	1	1	1	1	0	0	0			
CA-520	1	1	1	1	0	0	0			
CA-521	1	1	1	1	1	1	1	Regular program orientations	Outreach at community events (such as health fairs and veteran stands) (mvaas)	Case managers educate clients regarding other programs they may be eligible to receive
CA-522	1	1	1	1	1	1	1	Cultural competency training, including on LGBT homeless issues	Advertising on public access television	Advertising in local newspaper
CA-524	1	0	1	1	0	0	0			
CA-525	1	1	0	0	0	0	0			
CA-528	1	0	1	1	1	1	1	Formerly street homeless working with unsheltered homeless	Distributing phone cards and bus passes to street homeless	Distributing bottled water during summer months
CA-527	1	1	1	1	0	0	0			
CA-800	1	1	1	1	0	0	0			
CA-801	1	1	0	0	0	0	0			
CA-602	1	1	1	1	0	0	0			
CA-603	1	1	1	1	0	0	0			
CA-604	1	1	1	1	1	0	0	Working with community partners who may also serve people who are homeless i.e. adult education, union and art organizations, and Pocket Guide Resource Directory distribution	Presentations at family resource centers and civic organizations throughout the 1,650 sq. mi county	
CA-606	1	1	1	1	1	0	0			
CA-607	1	1	1	1	0	0	0			
CA-608	1	1	0	0	0	0	0			
CA-609	1	1	1	1	0	0	0			
CA-611	1	1	1	1	0	0	0			
CA-612	1	1	1	1	0	0	0			
CA-613	1	1	1	0	0	0	0			
CA-614	1	1	1	1	0	0	0			
CA-615	1	1	1	1	0	0	0			
CO-500	1	1	1	1	1	1	0	Project Homeless Connect events	Co-located services (e.g. the Murtha Center in FL Collins)	
CO-503	1	1	1	1	1	1	0	MDH involves formerly homeless persons in conducting outreach (Veteran Peer Interviewers during annual PIT) and 6 Peer Navigator positions providing navigation	Incentives with outreach efforts to encourage participation	
CO-504	1	1	1	1	0	0	0			
CT-502	1	1	1	1	0	0	0			
CT-503	1	1	1	1	0	0	0			
CT-506	1	1	1	1	0	0	0			
DC-500	1	1	1	1	0	0	0			
DE-500	1	1	0	0	0	0	0			
FL-500	1	1	1	1	0	0	0			
FL-501	1	1	1	1	0	0	0			
FL-502	1	1	0	1	0	0	0			
FL-503	1	1	0	0	0	0	0			
FL-504	1	1	0	1	0	0	0			
FL-506	1	1	1	1	0	0	0			
FL-506	1	1	1	1	0	0	0			
FL-507	1	1	1	0	0	0	0			
FL-508	1	1	0	0	0	0	0			
FL-509	1	1	1	1	1	1	1	PATH Street Outreach Coordinators	Veterans Services Outreach Teams	Shelter Plus Care Team Managers
FL-510	1	0	0	1	0	0	0			
FL-511	1	1	1	0	0	0	0			
FL-512	1	1	0	1	0	0	0			
FL-513	1	1	0	0	0	0	0			
FL-514	1	1	0	0	0	0	0			
FL-515	1	1	0	0	0	0	0			
FL-517	1	0	1	0	1	0	0	Providing information at high-volume service centers		
FL-518	1	0	1	1	0	0	0			
FL-519	0	1	1	1	0	0	0			
FL-520	1	1	1	0	0	0	0			
FL-600	1	1	1	0	0	0	0			
FL-601	1	1	1	1	0	0	0			
FL-602	1	1	1	0	0	0	0			
FL-603	1	1	1	1	0	0	0			