Endgame for Operation Rio Grande

As the high-profile law enforcement campaign in downtown Salt Lake City winds down, addressing the long-term damage that it created is just beginning.





November 2019

Last October, the ACLU of Utah published *Calculating the Real Cost of Operation Rio Grande*, a critical analysis of the first 14 months of the intensive law-enforcement campaign in Salt Lake City's Rio Grande neighborhood that increased many barriers for individuals experiencing homelessness. The report disrupted the narrative of success pushed by backers of Operation Rio Grande (ORG) by questioning the campaign's methods and outcomes, leading to a more realistic accounting of its impact on vulnerable populations.

A year later, we are releasing a follow-up report titled *Endgame for Operation Rio Grande* that explores the short- and long-term consequences for people impacted by this operation. This new report builds on our initial analysis by examining two 35-day snapshots—a year apart—of arrests tied to ORG, while reviewing how crime statistics have changed in the city during the years before and after ORG. It also identifies several operational and policy mistakes that intensified the immediate and long-term criminal justice burdens on people experiencing homelessness and suggests how activists and policymakers can apply the lessons learned from ORG to support the rollout of the new homeless resource centers (HRCs). While this report does not address the current debate over the capacity of the new HRCs and the closure The Road Home shelter, we believe our analysis shows how letting politics, timelines, and other outside pressures shape policies, instead of the actual needs of the homeless community, can exacerbate problems rather than solve them. These mistakes happened with ORG, and they can occur again with the new HRCs. We should also note that this report does not address not address in detail the medical treatment and workforce development goals of ORG that are beyond the scope of our analysis.

We are releasing *Endgame* as the landscape for managing homeless services in Utah is shifting. Politicians are exiting the stage while social service agencies and committees are taking on new and more powerful roles. Problems created by ORG's over-reliance on arrests and fines—especially for low-level crimes associated with being homeless—are becoming more apparent as public defenders, housing advocates, and social workers try to clean up the disorder it created in people's lives. We will show that ORG pursued a flawed model of using the criminal justice system as the main filter to address the intersection of homelessness and crime. Had law enforcement priorities and methods not dominated this effort, we believe a different approach could have realized positive results in the Rio Grande area without the substantial, long-term burden placed on thousands of people, local service providers, and our communities.

Failed approach

ORG was developed in mid-2017 to address a complex crisis of homelessness, substance abuse, mental health needs, and criminal activity affecting the Rio Grande neighborhood of Salt Lake City. Starting on Monday, August 14, 2017, law enforcement patrols led by the Utah Highway Patrol, Utah Department of Public Safety (DPS), Salt Lake City Police Department (SLCPD), and other agencies began constant patrols of several downtown streets and public areas with the primary goal of reducing crime, followed by secondary and tertiary phases to connect individuals to substance abuse treatment, housing, and employment.

Because this approach was led and dominated by law enforcement, the criminal justice system was immediately overburdened by the sheer volume of arrests—over 1,200 in the first 35 days, and 5,000 in the first year. While architects of ORG initially claimed the police patrols would target "the worst of the worst"¹ and "dangerous criminals"² preying on people experiencing homelessness, the on-the-ground reality was very different.

¹ "Who is being arrested in Operation Rio Grande? Many have felonies or lengthy records, though few appear to be the promised 'worst of the worst'," *Salt Lake Tribune*, September 18, 2017.

² "Operation Rio Grande Update," Utah House of Representatives, August 31, 2017; https://house.utah.gov/operation-rio-grande-update

Low-level catch and release

During the first 35 days of Operation Rio Grande in August and September 2017, 64.1% of the operation's 1,215 arrests³ were classified as misdemeanors or infractions.⁴ This means that almost two-thirds of the arrests made during the first month of ORG—when officials claimed to be targeting "higher-level offenders"⁵ were not connected to any felony-level offense. Furthermore, 317 arrests, or 26% of the total, were classified as only low-level class B or C misdemeanors or infractions such as open container violations, jaywalking, lewdness, or camping on public ground (fig. 1.0).⁶ Compounding this anticipated^{7,8} consequence of law enforcement acting as the leading edge of ORG was an imbalance of extra resources devoted to assisting people charged with low-level misdemeanors and infractions. While the state provided additional funding to District Courts to process the increased volume of arrests for felonies and class A misdemeanors generated by ORG, similar funding was not available to the City Justice Court that dealt with a surge in charges for lowerlevel class B and C misdemeanors. This meant that individuals, including many homeless individuals, who were cited and arrested for camping, drug possession, and other lower-level crimes became caught in a revolving door of the criminal justice system without the off-ramps to treatment options provided to people charged with more serious crimes. A joint team from the Utah DPS and Salt Lake Legal Defenders Association have been working to fix this disparity and improve access to treatment options since the start of ORG, but no solution is in effect as of yet.

The scale of arrests strained the system as the social service and treatment side of ORG proved unable—with the limited funding and space available when the campaign launched—to provide the necessary assistance. The result was a cycle of citations, arrests, bookings, and release (often due to overcrowding at the county jail) for many people experiencing homelessness. This revolving door created lingering collateral consequences— mainly from repeated interactions with the criminal justice system itself—to the population it claimed to be helping. Some individuals did receive treatment through ORG and credit their arrest as the beginning of the road to recovery.⁹ But for many others, the recurrent arrests, citations, warrants, and fines only exacerbated a bad situation. Only months later, after targeted¹⁰ and then expanded Medicaid funding began flowing into the system, did ORG's Phase 2 focus on substance use and mental health treatment gain ground, although it always lagged behind the Phase 1 public safety metrics published in monthly tracking reports.¹¹

Additional analysis indicates that widespread arrests for low-level offenses continued beyond the opening months of the operation. One year into ORG, during a similar 35-day period in August and September 2018, 69.6% of the 359 arrests with available charging data were classified as misdemeanors or infractions.¹² This means that 7 out of 10 arrests undertaken at the one-year anniversary of ORG were unrelated to any felony offense. Additionally, 123 arrests—or 34.3% of the total—were classified as class B or C misdemeanors or infractions such as injurious littering, criminal trespass, and possession of drug paraphernalia (fig. 1.0).¹³ Although the total number of arrests dropped by 70 percent between these periods in 2017 and 2018—an expected outcome of the police patrols and street closure initiated by ORG—the percentage of arrests for low-level crimes remained consistent. Despite assurances that ORG would target dangerous individuals and help

⁵ "Operation Rio Grande' launched near homeless shelter with arrests, big jump in police presence," Salt Lake Tribune, August 4, 2017 ⁶Rio Grande SLCo Confirm; https://app.smartsheet.com/b/publish?EQBCT=62d8119de22c4dfdb104ef62f1613bb9

³ Note: ORG arrest data may include some individuals arrested and released multiple times.

⁴ Rio Grande SLCo Confirm; https://app.smartsheet.com/b/publish?EQBCT=62d8119de22c4dfdb104ef62f1613bb9

⁷ "ACLU of Utah Statement on Operation Rio Grande," August 17, 2017; https://www.aclu.org/press-releases/aclu-utah-statement-operation-rio-grande

⁸ "An Alternative Perspective on Operation Rio Grande & the Criminalization of Homelessness," Org Code, October 16, 2017; https://www.orgcode.com/opriogrande

⁹ "Leaders, treatment providers reflect on success stories from 2 years of Operation Rio Grande," Deseret News, August 20, 2019.

¹⁰ Targeted Adult Medicaid Program, Utah Department of Health; https://medicaid.utah.gov/targeted-adult-medicaid-program (accessed October 10, 2019)

¹¹ "Calculating the Real Cost of Operation Rio Grande," ACLU of Utah; October 18, 2018.

¹² Rio Grande SLCo Confirm; https://app.smartsheet.com/b/publish?EQBCT=62d8119de22c4dfdb104ef62f1613bb9 ¹³ *Ibid.*

people in need, it inevitably swept up hundreds and then thousands of people, many of them dealing with homelessness or housing insecurity, for low-level crimes.

Fig.	1.0
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Category of Arrests during Operation Rio Grande	Total Arrests	Percent of Arrests for Misdemeanors (A, B, C) and Infractions	Percent of Arrests for Low- Level Misdemeanors (B, C) and Infractions
August 14 - September 17, 2017	1,215	64.1%	26.1%
August 14 - September 17, 2018	359	69.6%	34.3%

Source: Rio Grande SLCo Confirm; https://app.smartsheet.com/b/publish?EQBCT=62d8119de22c4dfdb104ef62f1613bb9

Even though the law enforcement focus of ORG is winding down, we believe its aftershocks will continue to shape efforts to address the social issues involving homelessness in Salt Lake City. That's because the impact of arrests and fines do not easily vanish from people's list of troubles—especially those with limited resources—but reverberate, often derailing their efforts to rebuild their lives.

Collateral damage

The interplay between our criminal laws and people experiencing homelessness is complex, especially when their unsheltered reality puts them at greater risk for law enforcement interactions. For example, under Salt Lake County code, it is a crime to lodge in a public "building, structure or place" without permission.¹⁴ Additionally, Salt Lake City municipal codes criminalize camping on public grounds—including streets, parks and playgrounds—as a class B misdemeanor that may result in up to six months jail, up to a \$1,000 fine,¹⁵ and a 90% surcharge on the fine.¹⁶ Other crimes that relate to non-negotiable areas of daily life include indecency laws for public urination, which is also a class B misdemeanor.¹⁷ Many of the daily activities people with secure housing take for granted—sleep, privacy, security, and going to the bathroom—are substantial areas of concern and worry for people experiencing homelessness.

Criminalizing the experience of homelessness can create long-lasting consequences for people without significant means, even when a person is given what many would consider a "slap on the wrist." These issues were made clear in a September 11, 2019, Salt Lake Tribune article that profiled a couple experiencing homelessness.¹⁸ Although the couple had recently moved into subsidized housing, they still had to deal with a combined 30 citations for violating no-camping ordinances. At the time of the article, 19 of the citations were dismissed while three citations resulted in convictions that led to probation and community service in lieu of fines totaling \$3,000. The article described how the couple prioritized taking care of the citations once they found housing, which distracted them from seeking healthcare and employment. Ironically, their lingering citations for being homeless prevented them from getting jobs and earning money to pay rent on the housing they had recently acquired—increasing the risk they would become homeless again. Additionally, the convictions for violating camping ordinances may create barriers to employment and some forms of financial assistance. This couple's scenario is far too common, showing how the criminal justice system casts a long shadow over people's lives even after they achieve some stability. While the police officer or trooper who makes the initial arrest or citation isn't present for, or likely even aware of, this long chain of negative consequences, their involvement makes it more likely the criminal justice system will shape the course of future outcomes. Ultimately, however, it is policymakers who determine the scope and intensity of how law enforcement will address low-level crimes disproportionately associated with people experiencing

¹⁵ Salt Lake City Code 11-12-080; Salt Lake City Code 15-08-080(A); Utah Criminal Code 76-3-204(2); Utah Criminal Code 76-3-301(1)(d)

¹⁴ Salt Lake County Code 10-36-010(k) Disorderly Conduct

¹⁶ Utah Criminal Code 51-9-401(1)(b)(i)(D)

¹⁷ Salt Lake County Code 10-28-010

¹⁸ "Formerly homeless couple adjust to challenges, opportunities of their new life indoors," Salt Lake Tribune, September 11, 2019.

homelessness. Looking at both the arrest records and anecdotal stories from the last two years, the ORG approach has negatively impacted many people with substance abuse issues and housing insecurity despite assurances that it wouldn't happen. To use a specific example, you can't claim to be going after "the worst of the worst" and then detain a woman on the first day of ORG for jaywalking before arresting her for outstanding warrants for drug offenses.¹⁹ Two years later we can look back to see that the same woman was arrested four more times for similar drug crimes that escalate from misdemeanors to a felony—making her the serious criminal ORG was originally looking for.²⁰

At the same time, courts are starting to recognize that a lack of housing makes certain aspects of daily life such as sleeping, eating, and using the bathroom—unavoidably public. A Ninth Circuit Court of Appeals decision in 2018 looked at camping and disorderly conduct laws in Boise, Idaho, which are similar to those on the books in Salt Lake City and Salt Lake County. The court determined that laws criminalizing sleeping outside in public places when no shelter space is otherwise available violates the U.S. Constitution's Eighth Amendment prohibition against cruel and unusual punishment. The court reasoned that sleeping in public is an unavoidable consequence of experiencing homelessness, and, when no shelter space is available, the choice to sleep outside is illusory.²¹

In light of the Ninth Circuit ruling, the SLCPD has changed how they interact with people sleeping and camping in public. Current SLCPD procedure is for officers first to contact a homeless shelter to determine if any beds are available, prioritizing finding shelter over issuing a citation. SLCPD also frequently uses a co-responder approach where an officer is paired with a social worker who can assess the individual and determine if they can address any underlying needs. SLCPD has been using this co-responder model since 2016 to better connect people experiencing homelessness to appropriate resources.²² Other ORG-affiliated law enforcement agencies have adopted the co-responder model within the Rio Grande neighborhood, even claiming their police and social workers teams can connect individuals to services more rapidly than traditional routes.

We believe these new methods of service-focused policing, lower-barriers to accessing treatment assistance, and court-sanctioned limitations on criminalizing homelessness will create space for better practices to address the myriad issues that ORG intended to resolve. Rather than relying on the criminal justice system to solve root causes of homelessness, we can prioritize and fund other models that bypass the negative aftershocks of the court and jail system.

Ironically, one model, called Operation Diversion, achieved moderate success in the Rio Grande neighborhood only a year prior to ORG. Organized and funded as a joint effort by Salt Lake City and Salt Lake County, Operation Diversion placed greater emphasis on diverting people away from the criminal justice system. Law enforcement contact would result in people going to a receiving center, jail, hospital, or back to the community. At a receiving center, a person could get a medical screening; a public defender orientation; a risk and needs assessment; and engage in a diversion program that would allow a person to go directly to substance abuse treatment or mental health treatment.²³ Operation Diversion had three initial deployments between September 29 to October 7, 2016. During that time, 132 individuals were contacted by law enforcement, 113 went to a receiving center, 17 went to jail, and 2 were hospitalized. Of those that went to a receiving center, 68 went on to receive treatment.²⁴ Compared to ORG, these numbers demonstrate that with proper resources and targeted efforts underlying issues can be addressed without needlessly pushing people into the criminal justice system.

 ¹⁹ "Operation Rio Grande' launched near homeless shelter with arrests, big jump in police presence," Salt Lake Tribune, August 4, 2017.
²⁰ Rio Grande SLCo Confirm; https://app.smartsheet.com/b/publish?EQBCT=62d8119de22c4dfdb104ef62f1613bb9

²¹ https://cdn.ca9.uscourts.gov/datastore/opinions/2018/09/04/15-35845.pdf Martin v. City of Boise, 902 F.3d 1031 (9th Cir., 2018).

²² "A social worker riding alongside an officer? It's the new norm for SLCPD," KSL.com, February 28, 2018.

²³ https://slco.org/cjac/initiatives-priorities/operation-diversion/

²⁴ Operation Diversion Statistics. Criminal Justice Advisory Council. Salt Lake County (2016).

https://slco.org/uploadedFiles/depot/fRD/CJAC/OperationDiversionStatistics.pdf

Fortunately, after ORG, the Salt Lake County District Attorney's office—with support of the Salt Lake County Mayor's Office—adopted a formal diversion model in August 2019 that is projected to keep between 750 to 1,000 people from entering the criminal justice system annually.²⁵ Additionally, the Salt Lake County Sheriff has introduced an online jail dashboard that allows policymakers, advocates, and other stakeholders to see data on incarcerated persons experiencing homelessness in real time.²⁶ Reforms like these can help address the revolving door of the criminal justice system and prompt other agencies to think about different tools they can use to address issues surrounding people experiencing homelessness. Moreover, reforms that elevate diversion models and data sharing also highlight the fact that avoiding the criminal justice system altogether is often the better approach to address issues involving housing, substance abuse, and mental health.

Impact of ORG on citywide and district-level rates of reported crime

A talking point repeated by ORG supporters is that crime rates dropped significantly in the affected area following its launch. And it's true. According to the publicly available data we reviewed, rates of reported serious crime in the Rio Grande neighborhood declined abruptly as soon as the campaign began. However, this result is not unexpected considering the operation's constant police patrols and decision to close Rio Grande Street. The more important questions to ask, however, are: 1) What has been the impact on adjacent neighborhoods of the city, and 2) Can the decline in reported crime be sustained without a persistent law enforcement presence?

First, a review of CompStat data acquired from the SLCPD indicates that reported Part 1 crimes—the most serious crimes categorized by the FBI, including homicide, assault, robbery, and larceny—dropped significantly in the Operation Rio Grande area²⁷ immediately after the campaign began in August 2017—indicated by "2017-M8" on the chart at the end of the report (see Fig 2.0). Note: We analyzed reported crime using the "Last 28 Days" metric after SLCPD advised it was the most accurate and comprehensive category. In addition, the percentage of reported Part 1 crimes within all of Salt Lake City geographically tied to the ORG area fell from 15.5% in 2016 to 11.5% in 2018—a 25% decline (see Fig. 3.0).

These two charts (Figs. 2.0, 3.0) show that reported Part 1 crimes dropped significantly in the Rio Grande area after the start of ORG—both in absolute numbers, and as a percentage of overall reported crime in the city. It should be noted that the proportional increase in reported crime for the rest of the city (84.5% to 88.5%) does not indicate an actual increase, as overall crime rates across the city declined during these time periods. These two charts depict the localized impact of ORG on reducing reported crimes in a specific neighborhood of Salt Lake City.

Meanwhile, the percentage of reported Part 1 crimes in four Salt Lake City council districts (D1, D2, D5, D7) increased in proportion between 2016 and 2018, while percentages decreased in three districts (D3, D4, D6) (see Fig 4.0). The council districts showing the largest proportional increases were Districts 2 (+9.8%), which includes Glendale and Poplar Grove, District 1 (+2.5%), which includes Rose Park, and District 7 (+2.4%), which includes Sugar House. Again, a proportional increase in reported crime does not indicate an actual increase, just a greater share of the overall total.

Across all Salt Lake City council districts, rates of reported Part 1 crimes had been declining prior to ORG. However, this decline has slowed in 2019 as rates of reported crimes more closely tracked—with periodic peaks and valleys—the 2018 averages in Districts 1, 2, 4, and 5 that are adjacent to the ORG area. (Fig. 5.0)

²⁵ "Salt Lake County rolls out criminal justice diversion program," KSL.com, July 30, 2019.

²⁶ https://slsheriff.org/page_jail_dashboard.php

²⁷ According to SLCPD, the ORG geography was initially defined as North Temple to 900 South, and 300 East to I-15. As of 2019, SLCPD trimmed the southern perimeter to 700 South and eastern perimeter to State Street. "Homeless in Utah: What happened to Rio Grande crime after Operation Rio Grande," *KSL.com*, May 8, 2019.

In summary, ORG resulted in a rapid and significant drop in reported Part 1 crimes in the Rio Grande area, accelerating the trend of declining crime rates happening citywide since 2015. Reported Part 1 crimes also declined in adjacent council districts—following an existing citywide trend—after ORG began, except for periodic spikes during the summer months. But after significant declines in 2017 and 2018, the downward slope of reported crimes has slowed or leveled off in 2019, especially in District 2 (Glendale and Poplar Grove) and District 4 (Downtown and Central City).

It's also important to note that CompStat data tracks serious Part 1 crimes, while many of the recently publicized complaints²⁸ from neighborhoods adjacent to the ORG target area have been about Part 2 crimes, which include vandalism, simple assault, disorderly conduct, most drug offenses, and receiving stolen property. According to SLCPD, rates of Part 2 crimes are down citywide in 2019 compared to 2018, with a localized increase in District 6 (East Bench) and a smaller increase in District 1 (Rose Park).

One neighborhood that bears mentioning is Ballpark, which spans Districts 4 and 5 and is located south of downtown Salt Lake City. Ballpark was the location of four homicides in the last 12 months, as well as widespread complaints about property crimes, drug trafficking, and more people experiencing homelessness in the community.²⁹ Ballpark is an example of an area where complaints have led to increased SLCPD patrols and attention, a reaction that may be related to the dispersal of criminal activity from the Rio Grande area by ORG. Other hotspots include the 700 West-block of North Temple, where SLCPD placed a temporary police substation in July 2018, the Jordan River area, and Liberty Park. While an increased police presence can result in lower rates of reported crime, the impact often proves temporary, as it did on North Temple after SLCPD dismantled the substation. Plus, one impact that isn't registered in CompStat data is the significant increase in police calls and allocation of patrol officers that SLCPD has devoted to adjacent areas of Salt Lake City since ORG began.

Protecting rights and dignity of impacted communities

Throughout 2018 and 2019, a drumbeat of media attention, conversation, and debate has followed the site selection, funding, and construction of three new resource centers to replace The Road Home emergency shelter in downtown Salt Lake City following its expected closure in late 2019. Homeless advocates, former politicians, and Salt Lake City mayoral candidates have raised concerns about the ability of these resource centers to accommodate people with insecure housing. While these debates often focus on logistical issues of location, capacity, and services, we believe the discussions should include another important question: How will these new resource centers and the policies that guide them impact the rights and dignity of people experiencing homelessness?

We believe the success of these new resource centers not only depends on their design, funding, internal policies, and interface with law enforcement, but also how they are perceived by the populations experiencing homelessness. Beyond a bed and a meal, people also need an environment focused on protecting and promoting their privacy, civil rights, dignity, and self-determination.

Going forward, we need to acknowledge that people experiencing homelessness are stakeholders in policy decisions, and the best judges of new ideas are often the people they're designed to help. For example, imagine how the priorities of ORG could have changed if the operation's planners had sat down more with people experiencing homelessness and recognized the long-term, negative impacts that thousands of arrests, citations, and fines would have their ability to rebuild their lives. From stricter "No Camping" ordinances, to transportation between homeless service locations, to warrant checks at the door of new resource centers, each new policy should be evaluated based on how it impacts people experiencing homelessness—and always with significant input from these populations. Fortunately, service providers like Catholic Community Services,

²⁸ "Ballpark residents frustrated with crime turn to mayoral candidates for action," KSL.com, September 7, 2019.

²⁹ "Four homicides in one year have Ballpark neighbors calling for action," Salt Lake Tribune, September 29, 2019.

Volunteers of America, Utah, and Project Homeless Connect, as well as treatment centers like First Step House, Odyssey House, and umbrella groups like the Salt Lake Valley Coalition to End Homelessness share a commitment to community-based decision-making and listening to the needs of their clients. Ultimately, planners and resource providers must consider the needs of the community, which includes people experiencing homelessness, and whether we can meet those needs while also respecting their rights to dignity and privacy.

We believe the future success of the current transition to the resource center model can be advanced by the adoption of a Homeless Bill of Rights³⁰ by service providers and the centers themselves. A Homeless Bill of Rights discourages the criminalization of homelessness, provides clear guidelines on how to evaluate policy decisions that affect the homeless population, and upholds the dignity and privacy of people who are experiencing homelessness. At the ACLU of Utah, we know that the rights of vulnerable and marginalized populations are often the first to be overlooked or infringed upon. Adopting a Homeless Bill of Rights will be a visible reminder that everyone is equal under the law, and could include the following:

1) Protection from harassment or intimidation in public and private spaces where people have a right to be,

2) The right to register to vote and the right to vote,

3) The right to be notified of any changes in homelessness services by the appropriate agency 60 days in advance,

- 4) The right to privacy for their personal property,
- 5) The right to equal treatment, regardless of housing status,
- 6) The right to emergency medical care and protection from discrimination in receiving care,
- 7) Protection from employment discrimination based on housing status, and
- 8) Protection from the undue disclosure of personal information.

A Homeless Bill of Rights can facilitate future discussions on issues that arose during ORG and continue at the new homeless resource centers. If we want to provide meaningful help to people experiencing homelessness, we need to respect their dignity and make their voice and rights central in every interaction and decision. The Homeless Bill of Rights is more than a mere suggestion; it is a strong impetus for further conversations among all parties, including neighbors of the new HRCs. These principles create a guidebook for protecting the franchise, privacy and civil rights of those we aim to aid while continuing us down the path of progress.

Overall, we need to proactively take the lessons learned from ORG and implement them before we find ourselves haphazardly responding to another self-created crisis. For example, we should evaluate and modify law enforcement policies to align with emerging caselaw on homelessness issues and best practices. We should also consider long-term legislative fixes that can fund housing programs and treatment options—like Operation Diversion—that do not require arrests or citations so we can avoid filtering these issues through the criminal justice system. If we fail to adjust our approach based on the lessons from ORG, we will again find ourselves trying to arrest our way out of homelessness, substance abuse, and mental health issues.

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³⁰ "Homeless Bill of Rights," National Coalition for the Homeless; https://nationalhomeless.org/campaigns/bill-of-right/

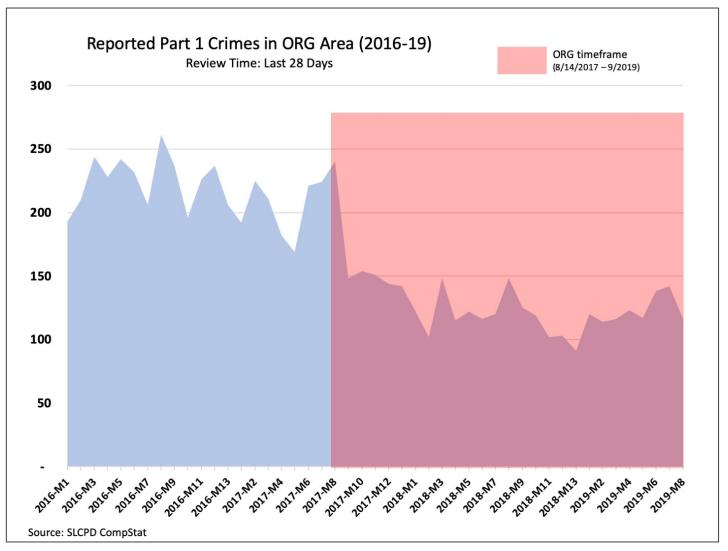


Fig. 3.0

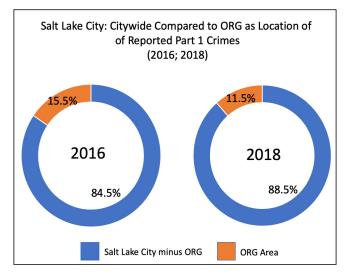


Fig. 4.0

