

City of Detroit in partnership with the Detroit Homelessness
Response System

Response to Address Health and Safety Concerns Among Unsheltered Populations

Policies & Procedures

Adopted: December 2020

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PURPOSE

This document provides a response and protocol for our municipality's engagement of unsheltered individuals in the City of Detroit, specifically when health and safety concerns are identified. **Unsheltered homelessness** is when an individual or family lacks a fixed, regular, and adequate nighttime residence, meaning a public or private place not meant for human habitation.¹ These policies address both single individuals experiencing unsheltered homelessness, as well as groups of unsheltered individuals. In this document, a **site** is defined as "one or more tent, structure, or assembly of camping equipment or personal property that appears to a reasonable person to be used for overnight shelter." Those using the site as overnight shelter are referred to as **occupants**. Further, an **encampment** is multiple sites composed of four or more occupants and/or tents.

Unsheltered homelessness creates health and safety stressors for the entire community, but particularly to those living on the streets. The City of Detroit (the City) and its partners recognize that strategies to address these stressors must address the concerns of both unsheltered individuals and the larger community. In addition, the City and its homelessness partners acknowledge the need for robust coordination between city entities, service providers, and unsheltered individuals to effectively address any health and safety concerns, as well as holistically meet their needs. It is critical that these policies and procedures uphold the needs and vulnerabilities of unsheltered individuals to ensure appropriate coordination.

The response outlines two major processes: 1) **Assessment**: How occupants are assessed for needs and, if health and safety concerns are present, how sites are assessed for health and safety conditions; 2) **Coordination**: What kind of coordination is necessary to connect occupants to available resources and, if health and safety conditions warrant occupant relocation, how occupants and their belongings are assisted in relocating. Given the assessment and coordination processes, this document aims to include the following:

- How City departments and service providers are coordinating and implementing efforts
- Specifics related to roles and required components (e.g. outreach and engagement provided, notice required, storage of personal belongings, and coordination of available resources)
- A Health & Safety Assessment and levels of recommendations to address health and safety concerns, if any

The policies and procedures described in this document apply to individuals occupying (i.e. living) in all public and city-owned spaces in the City of Detroit. This policy does not apply to individuals who are actively panhandling and have housing. Implementation will be overseen through inter-departmental coordination within the City and in partnership with homeless service providers. Those tasked with implementing and overseeing the process on an ongoing basis are homeless outreach teams and the following City departments: Housing and Revitalization Department (HRD), Detroit Police Department (DPD), and Detroit Health Department (DHD). A broader range of partners will be engaged as needs arise during implementation and evaluation of this process. Implementing entities will ensure that CDC guidance is followed, particularly during times of public health crises to the maximum extent possible.

For any questions related to this policy, contact the Housing and Revitalization Department at (313) 224-6380.

BACKGROUND

After reviewing the process of a site's relocation in February 2019, the City identified a need for better coordination with providers and for person-centered protocol to address future health and safety concerns affecting unsheltered individuals. Policies and procedures were drafted by the City jointly with homeless service providers that could provide the appropriate local context and population expertise (see next section for entities involved).

¹ HUD Homeless definitions:

https://files.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf

As this is the first policy of its kind in Detroit, this policy was adopted on a three-month interim basis starting July 22, 2020. At the end of the three-month period, the policy was updated based on evaluations conducted after each implementation of the policy, as well as a final evaluation with the original ad hoc workgroup that drafted the interim policies.

The following were kept in mind as these policies and procedures were created and piloted:

On any given night, 158 individuals experience unsheltered homelessness (based on 2018 Detroit Point-in-Time Count numbers). Those experiencing unsheltered homelessness are typically the most vulnerable and the most difficult to engage, as well as the most unwilling or unable to go to shelter, oftentimes due to mental health or substance-use issues. The California Policy Lab² reported that individuals experiencing unsheltered homelessness are 25 times more likely to report they suffer from the tri-morbid combination of physical health conditions, a mental health issue, and a substance-use condition than individuals experiencing sheltered homelessness (50% compared to 2%). This creates a need for a coordinated plan that facilitates access to services and resources for unsheltered occupants to meaningfully address and end their homelessness.

Until there is enough safe, decent, affordable, and accessible housing for everyone, people will continue to live in unsheltered environments. Although Detroit operates its supportive housing system with a housing first perspective, there are still requirements to be considered for housing that are barriers to unsheltered individuals, such as identification. Efforts are in place to address these barriers and also increase housing availability for those experiencing homelessness. The homelessness system and its partners will not stop working until homelessness is rare, brief, and one-time.

All sectors of the community must work together to mitigate and address health and safety hazards experienced by unsheltered individuals. A healthy community includes protecting the health and safety of all residents, whether housed or unhoused. Protecting the health and safety of all residents, both housed and unhoused, will create a healthier community for all. We need to end our neighbors' homelessness, not sweep it out of sight. Coordinating with all sectors is critical for this and can include community mental health, substance-use treatment providers, hospitals, law enforcement, public health, and others as needed.

The overall goal of this document is to assess an individual's needs and address any health and safety concerns while being person-centered and mindful of their unique barriers and needs. **One critical component of this work is to ensure homelessness is not criminalized or swept out of sight.** Fines and citations, site or encampment clearings, and other municipal practices and policies that disrupt and displace people create additional barriers and setbacks for people experiencing homelessness, making it more likely that people will remain homeless even longer. The City and its partners recognize the vulnerability of people experiencing unsheltered homelessness and their rights as housed residents, as well as aim to support their needs and facilitate access to interim and permanent housing.

DRAFTING PROCESS

City administration delegated the drafting and implementation process to the Homelessness Solutions team within HRD to be completed in tandem with homeless services providers, relevant City departments, and other identified partners. The following process was undertaken:

1. A review of best practices and other cities' protocol, guidelines, and ordinances
2. Initial feedback regarding the process was obtained from Detroit's homeless service system and its providers

² Newsroom UCLA news article: <http://newsroom.ucla.edu/releases/serious-health-conditions-trauma-unsheltered-homeless>

3. Engagement of appropriate City departments and homeless service providers (e.g. DPD and homeless outreach teams) provided a foundation for the drafted protocol
4. Ad hoc workgroup of relevant City departments, homeless services providers, and relevant partners reviewed and finalized policies and procedures
5. Implementation requirements and timelines were determined

The drafting process began in the spring of 2019 with the intent to implement a pilot to provide the opportunity to refine the process over a three-month trial period. This document and the pilot were created in partnership with the below service providers and City departments. Feedback was sought in different formats, including an ad hoc workgroup that came together to finalize the process and related documents.

- **Lived Experience** - Detroit Action Commonwealth (DAC)*; Neighborhood Service Organization (NSO)*
- **Shelter/Warming Center** - Detroit Rescue Mission Ministries*
- **Outreach** - NSO*, Cass Community Social Services, Community & Home Supports
- **Coordinated Entry** - Coordinated Assessment Model (CAM)*
- **Continuum of Care lead agency** - Homeless Action Network of Detroit (HAND)*
- **Continuum of Care Board** - Pope Francis Center*
- **Chronic Homelessness Leadership Committee** - the NOAH Project*
- **City of Detroit (City) Homelessness Solutions** - Housing & Revitalization Department (HRD)*
- **Law Enforcement** - Detroit Police Department (DPD)*
- **Clean Up** - Detroit General Services Department (GSD)*
- **Health Department** - Detroit Health Department (DHD)*
- **Legal** - City Law Department*
- **Medical Outreach** - Street Medicine Detroit*
- **Community Mental Health** - Detroit Wayne Integrated Health Network*
- **Local Businesses** - Downtown Detroit Partnership*

*Encampment Workgroup representatives

GUIDING PRINCIPLES

Guiding principles provide a framework for expectations and decision-making. The following principles have been established and adopted to ensure that the needs and vulnerabilities of unsheltered individuals are upheld and addressed.

1. **People experiencing homelessness have the same civil rights as housed residents³.**
 - Unsheltered individuals, as all citizens, are deserving of the same access to public services and protection by law enforcement.
 - We believe that all should have access to safe, decent, and affordable housing; outreach has the goal of working towards this with all unsheltered individuals.
 - An approach with the goal of engagement, not enforcement, is more likely to build trust and rapport.
 - It is acknowledged that fines and jail-time make it more challenging for homeless individuals to achieve stability, work towards their goals, and secure employment and/or stable housing. This includes repercussions that pertain to life-sustaining activities (e.g. sitting, sleeping, eating), which disproportionately impact people living on the streets.
2. **All unsheltered individuals, like all City residents, will be treated with dignity and respect.**

³ Used language from the Los Angeles Homeless Services Authority: Guiding Principles and Practices for Local Responses to Unsheltered Homelessness: <https://www.lahsa.org/documents?id=2951-guiding-principles-and-practices-for-unsheltered-homelessness.pdf>

- All communication, verbal and written, will use language that is at the occupants' level (e.g. not using jargon and taking into consideration any literacy and language barriers); interpretation and other language and literacy services will be provided as needed.
 - Occupants will be part of decision-making and determining their next steps.
 - Service providers will do due diligence to understand and respect the circumstances and needs of unsheltered individuals and the space they occupy.
 - Agreed upon time is given for engagement, including sufficient notice given and coordination of services desired by the occupant(s) in both emergent and non-emergent settings.
 - Belongings will be stored respectfully, meaning there is a commitment to document the belongings and that they are accessible for pick-up.
3. **All relocations of unsheltered individuals are done in collaboration with appropriate partners and include resource offerings whenever possible.**
- As outreach staff has been specially trained to work with those experiencing unsheltered homelessness, it is key that they take the lead in the engagement and coordination with unsheltered individuals.
 - Providers will take the time to identify established connections that occupants have and will involve those service providers or supports in the process.
 - If occupants lack necessary connections, service providers will ensure linkage to the system and resources.
 - Resource offerings will be provided whenever possible and deployed with a sense of urgency.

OVERVIEW: PROCESS, ENTITIES RESPONSIBLE & TIMELINES

While each of these processes are explained in more detail later in this document, the graphic on the next page provides an at-a-glance overview of the process, entities responsible, and timelines.

Steps 1-3: When a report of an unsheltered individual(s) is made, homeless outreach is deployed to engage with occupant(s) to assess needs and offer resources. If the report includes a health or safety concern, health and safety officials will conduct a health and safety assessment of the site.

Steps 4-7: If a health and safety assessment determines high health and safety risk(s) for occupants and their neighbors, steps 4-7 below display required steps to relocate occupants and their belongings.

OVERVIEW: PROCESS, ENTITIES RESPONSIBLE & TIMELINES, CONTINUED

CITY OF DETROIT PROCEDURE: Health & Safety Assessment of Homeless Sites and Encampments

		DESCRIPTION	ENTITY RESPONSIBLE	TIMEFRAME
ASSESSMENT & ENGAGEMENT	1 NOTIFICATION & COORDINATION	Centralized reporting to HRD to ensure consistent response to all encampment notifications or reports. HRD ensures coordination of all next steps.	HRD receives report & contacts DPD, DHD, & Outreach for next steps	Within 24 hours of report
	2 SITE ASSESSMENT & OCCUPANT ENGAGEMENT	Health & safety officials assess health/safety conditions to make any necessary recommendations based on conditions. Outreach engages occupants to assess needs and connect to resources & services.	Site Assessment: DPD NPOs & DHD, (DFD when needed) Occupant Engagement: Outreach teams	Within 48 hours of report or sooner in emergent cases
	3 HEALTH & SAFETY RECOMMENDATION	Based on site assessment, one of the following recommendations will be made: --No action needed beyond outreach engagement --Recommendations to address moderate levels of risks; further action may be required if risks are not mitigated by a specific date; OR --Recommendation to relocate occupants (Level 1 protocol is emergent and mobilizes an immediate move; Level 2 protocol is non-emergent)	Recommendation(s): DPD NPOs & DHD Occupant Engagement: Outreach; other entities engaged based on recommendations	Within 48 hours of report or sooner in emergent cases
OCCUPANT RELOCATION <i>(only if recommended)</i>	If relocation is recommended, proceed to step 4			
	4 COMMUNICATION & NOTICE	If relocation is recommended, written notice posted (verbal notice when possible). Outreach reviews notice with occupants to ensure understanding of relocation details.	Official Notice: DPD with DHD Ensure understanding: Outreach	Level 1: Within 24 hours of recommendation Level 2: Within 48 hours of recommendation
	5 OCCUPANT RELOCATION PLAN	Outreach works with occupants to identify a safe place for themselves and their belongings and to help them move.	Outreach, other entities engaged as needed	Level 1: Within 24 hours of recommendation Level 2: Within 48 hours of recommendation
	6 BELONGINGS STORAGE & SITE CLEAN UP	Any belongings left or that could not be taken by occupants will be stored by the NOAH Project. Signage with retrieval instructions posted by outreach. A clean up entity will clean the site after belongings are removed.	NOAH Project (outreach posts sign and supports as needed); Clean up entity based on location	Level 1: 48 hours or less after recommendation Level 2: 14 calendar days after recommendation
	7 DOCUMENTATION & EVALUATION	Documentation of process, outcomes, and storage completed Protocol implementation is evaluated and changes made based on feedback	All entities involved, HRD coordinates HRD coordinates with all entities involved	Day of relocation Within one month of relocation

KEY

HRD: City of Detroit Housing & Revitalization Dept. DHD: Detroit Health Dept. Outreach: Detroit homeless outreach providers
 DPD NPOs: Detroit Police Department's Neighborhood Police Officers DFD: Detroit Fire Dept. Clean up entity: varies by location
 Level 1: Emergent move as defined by policy Level 2: Non-emergent move as defined by policy

RESPONDING TO UNSHELTERED HOMELESSNESS REPORTS

One Point of Contact: Unsheltered Homelessness Reports

While reports or notifications of unsheltered homelessness may be received by several different entities (e.g. DPD, Mayor's Office), all reports or notifications will be routed to a single point of contact: the City's Housing and Revitalization Department's Homelessness Solutions team. This ensures consistency in implementing the policies and procedures described in this document. HRD Homelessness Solutions staff receive the report, dispatch homeless outreach teams, and, if needed, trigger a health and safety site assessment as outlined in the next section. Internal City staff, external partners, and private citizens can report any issues related to unsheltered homelessness by completing [this form](#).⁴ This form can be accessed on the [City's How Do I website](#)⁵ under homelessness. HRD staff will notify homeless outreach staff within 24 hours of the report so outreach can engage and assess needs. If a health or safety concern is reported, HRD staff will notify health/safety assessors within 24 hours of receiving the report so that a health and safety assessment can be completed of the site.

Outreach Engagement and Connection to Resources

Outreach providers will receive details of the unsheltered individuals so they can engage with them to provide support and connection to available resources. Engagement will occur as soon as possible (within 48 hours of report) and after any immediate safety concerns are addressed. The ultimate goal of outreach is to assess occupant needs, connect them with appropriate resources and services, and, in the event of a necessary occupant relocation, determine the next steps for all occupants and their belongings in coordination with HRD, DHD, and DPD.

As with any outreach engagement, outreach providers provide the following:

- Needs assessment (could include conducting the VI-SPDAT, a common assessment tool used to match assessed vulnerabilities with appropriate intervention)
- Connect individuals to resources and services based on need (e.g. mental health, medical, food)
- Address homeless/housing needs:
 - Offer emergency shelter
 - If individual is not currently connected, outreach ensures interested individuals are on the homeless response system's by-name list that is used to identify, track, and connect those experiencing homelessness to the appropriate permanent housing resources

RESPONDING TO HEALTH AND SAFETY CONCERNS

Site Assessment

If a health and safety concern is reported, a DPD officer and where appropriate a Detroit Fire Department (DFD) inspector (safety official) together with a DHD officer (health official) will complete a health and safety assessment (Appendix D) of the site and its conditions within 48 hours of the report. If the report indicates an emergent situation, the assessment will occur as soon as possible. Information collected includes, but is not limited to, the following:

- **Location Description and Site Accessibility:** type of site (e.g. park, highway shoulder), type of structures (e.g. tent), weather conditions, whether something imminent is scheduled at the site (e.g. construction), how easily emergency services can access the site
- **Occupant Information:** estimated number of occupants, estimated ages, medical conditions observed
- **Health Conditions:** garbage, biohazards, presence of vermin, whether occupants are associated with a reported disease outbreak

⁴ <https://app.smartsheet.com/b/form/4e7657fd3aed4d85b2880e5d156439of>

⁵ <https://detroitmi.gov/how-do-i/request-service-or-assistance>

- **Safety Conditions:** fire risks, criminal activity (beyond illegal drug use), exposure to moving vehicles, interference with pedestrian safety

The levels of health and safety conditions, described below, will help the health and safety officials determine a recommended course of action, if any, for the site and its occupants.

Site Assessment Conditions

The assessment collects information about health and safety conditions using the following levels:

- **None Observed (NO)** - Condition listed not observed, no action required.
- **Low Levels (LL)** - Levels are low, no imminent action required.
- **Moderate Levels (ML)** - Levels are moderate, mitigation strategy may be recommended to decrease or address levels
- **High Levels (HL)** - Levels are a risk to the occupants; recommendations will be made to address risk(s)

The level of conditions will then yield a recommendation as outlined in the next section.

Health & Safety Recommendation

After an assessment is complete, the health and safety officials will make recommendations as follows:

- No action needed beyond outreach engagement of occupants; OR
- Recommendations made to address moderate levels of risks; further action may be required if risks are not mitigated by a specific date; OR
- Emergency or non-emergency recommendation to relocate occupants as follows:
 - **Level 1:** Risks are at a level that warrant an immediate relocation of occupants; Relocation to be completed within 48 hours of assessment or sooner if the situation presents an immediate health and safety risk
 - **Level 2:** Risks warrant the relocation of occupants within 14 calendar days of assessment

Recommendations in the assessment will be detailed as to the reasons behind the recommended action and any next steps required. Recommendations may involve mitigation strategies that require follow-up to determine if any further action is needed, as well as any other entities that would need to be engaged beyond outreach providers (e.g. street medicine, Child Protective Services).

Special Circumstances

Certain types of sites and circumstances will require a relocation each time they occur. **In these instances, an assessment is not required, however, ALL procedures under the Occupant Relocation section (pages 9-12) would remain in place.** ONLY situations or site types listed below can bypass the assessment process and the occupant relocation process would commence. It is critical that coordination with outreach and the appropriate amount of time is allotted for the successful engagement and relocation of affected occupants.

- **Highway/expressway/freeway overpass-** the proximity to fast-moving vehicles and sloped pavement made this type of site a safety hazard. HRD will coordinate with outreach teams and DPD to relocate individuals within 14 days of report
- **Scheduled Events (e.g. Hart Plaza, Roosevelt Park)-** Unsheltered individuals would not be able to continue to overnight in spaces that are contracted out for events. Vendors should [submit a report to HRD](#) if anyone is currently using any public event space for overnight shelter at least 14 days in advance of event. HRD will coordinate with outreach and event vendors to ensure a successful relocation
- **Scheduled construction-** Construction sites can be a safety hazard to the public, including unsheltered individuals. Construction plans should include a site evaluation for unsheltered individuals and [submit a report to HRD](#) if needed at least 30 days in advance of construction start date. HRD will coordinate with outreach and construction teams to ensure a successful relocation

OCCUPANT RELOCATION

In the event that health and safety officials recommend that occupants be relocated due to health and safety risks, the process described below will be followed.

Communication & Notice

Targeted notice to occupants is critical, as is communication with homeless service providers and other relevant City departments for a successful implementation of these policies and procedures. All communication, whether verbal or written, will be done with consideration for the needs of vulnerable unsheltered occupants, including the following:

- Language used should be clear and population-appropriate.
- Verbal and in-person notifications are critical, especially to address any literacy and language barriers, as well as to accommodate thinking in day-to-day or hour-to-hour terms.
- Detroit service providers indicate that primary language spoken by site occupants is English, while some communicate by speaking Spanish or using American Sign Language. This will vary by site, and the appropriate interpretation services will be provided as needed

Level 1 Communication & Notice

If the assessment determines a Level 1 action, health and safety assessors immediately notify HRD and outreach providers and share the assessment and occupant details. Level 1 communication and notice protocol is as follows:

1. Within 24 hours of the assessment, DHD will post a written notice (Appendix B) in a visible location that communicates outreach contact information, relocation date/time, and where belongings can be retrieved. If occupants are present when sign is posted, posting entity will also verbally notify occupants of these details.
2. Within 24 hours of the assessment, homeless outreach providers will attempt to contact all occupants. Outreach staff is responsible for engaging with occupants and determining next steps for the individuals and their belongings. This will also help occupants prepare for and understand the official City notice, the reason for the urgency, and help enforce the timeline.

If any safety concerns are present, DPD can accompany DHD when posting signs.

Level 2 Communication & Notice

If the assessment determines a Level 2 action, health and safety assessors will immediately notify HRD and outreach providers, and share the assessment with the site and occupant details. If any safety concerns are present, DPD can accompany DHD when posting signs. Level 2 communication and notice protocol is as follows:

1. Within 48 hours of the assessment, DHD with DPD, will post a written notice (Appendix B) in a visible location that communicates outreach contact information, relocation date/time, and where belongings can be retrieved. If occupants are present when the sign is posted, the posting entity will also verbally notify occupants of these details.
2. Within 48 hours of the assessment, homeless outreach providers will attempt to contact all occupants. Outreach staff is responsible for engaging with occupants and determining next steps for the individuals and their belongings. This will also help occupants prepare for and understand the official City notice and enforce the timeline.

Notification Signage

A written notice (Appendix B) shall be posted by DHD with DPD near or on each tent or structure 48 hours prior to relocation for Level 1 and 14 calendar days prior to relocation for Level 2. The notice will include the following:

1. The date the notice was posted
2. The date the relocation is scheduled

3. Time range that relocation will commence, which may range no more than four hours
4. Contact information for an outreach provider that can provide shelter alternatives and help with moving belongings

The notice shall be printed in English and Spanish, and any other language the City determines is necessary based on feedback from outreach teams familiar with the occupants. If any safety concerns are present, DPD can accompany DHD when posting signs.

If the relocation is not completed on the day listed on the notice due to unforeseen circumstances, in order to treat people with dignity and respect, a new notice must be given and posted. If rescheduling is after the 48 hours for Level 1 or 14 days for level 2, the new date will be determined based on outreach, DPD, and the clean-up entity's schedules.

Occupant Relocation Plan

In the event that occupant relocation is recommended, HRD will ensure careful coordination with all required partners, including DPD, DHD, outreach, NOAH, and any others as needed. These policies recognize that additional coordination and resources may be required for encampments (i.e. sites of four or more individuals). In encampments, there are often multiple entities already assisting occupants with meeting their daily needs, such as street medicine and community mental health. It will be critical for these entities to understand the relocation process as outlined in this document, as well as be involved in relocation efforts. HRD will be the lead on this level of coordination as well as any additional services that may be required due to circumstance or group size, such as additional transportation, storage, and clean-up needs.

Outreach Expectations

During a recommended occupant relocation, outreach is responsible for helping occupants determine next steps for all occupants and their belongings, in coordination with HRD, DPD, DHD, and NOAH. Outreach staff will commit to engaging with occupants as appropriate, with increased frequency leading up to a relocation date.

The following are expectations of outreach providers:

- Engage with occupants at least 24 hours post assessment for Level 1 protocol and 48 hours post assessment for Level 2 protocol or if no protocol is enacted
- Communicate to occupants what is going to happen and the contents of the written notice
- Compile a list of occupants and details about each individual that will be relevant to successful engagement and linkage to housing
- Connect individuals to resources and services based on need (e.g. mental health, medical)
- If a current assessment is not on file, the VI-SPDAT (common assessment tool) is completed
- Participate in scheduled meetings with CAM, HRD, and other relevant partners as appropriate to track and review needs and status updates for occupants, as well as connect occupants to permanent housing resources if and when possible
- Assist individuals to relocate themselves and their belongings to an identified, safe location before or on the day of the relocation

Addressing Occupant Needs

To ensure all occupants and their belongings are relocated to safe locations, it will be important for homeless service providers to coordinate together and track individual next steps and connection to resources. Encampments may require additional coordination as indicated below. Coordination necessary for a relocation plan will include:

- **Assessment and connection to resources:**
 - Once outreach assesses occupants, outreach staff will determine occupant's current housing plan or status.

- If the occupant is not currently connected, outreach ensures interested individuals are on the homeless response system's by-name list that is used to identify, track, and connect those experiencing homelessness to the appropriate permanent housing resources.
- **Coordination of relocation plan:**
 - HRD works with partners to identify any other entities that need to be involved (e.g. street medicine, behavioral health, faith-based organizations). HRD will brief additional partners and invite them to participate.
 - HRD schedules a logistics call with DPD, DHD, and outreach to outline the relocation plan, including belongings and storage, potential occupant challenges, and other relevant details. Check-in calls are scheduled as needed to follow up on status and next steps. Note: No protected health information is shared during these calls.
 - The relocation plan will be shared with all entities involved and followed the day of the move to ensure all understand next steps for each individual (e.g. if they already moved belongings, where they are going, etc.). Any updates to the plan will be communicated accordingly.
 - HRD and Outreach will work with CAM to located shelter beds as necessary
- **Addressing additional needs for encampments:** If a site includes 4 or more individuals, HRD will take added steps to address additional needs, which could include:
 - Addressing additional transportation, storage, and clean-up needs
 - Coordination with State partners around available resources
 - Addressing any existing barriers (e.g. needing an ID to move into housing)
 - An expanded timeline as necessary for a successful relocation; notice posting and other protocol in this document will be adjusted accordingly
 - Working with CAM and shelter providers to explore shelter options if individuals express a need to be relocated together
 - Other coordination efforts as deemed by the circumstance

Day of Relocation

On the day of the scheduled occupant relocation, outreach works to assist occupants with moving themselves and their belongings, storing belongings as necessary. Outreach will help individuals navigate the relocation and assist with the moving of personal belongings and occupants to a shelter or a safe alternative. The NOAH Project, a nonprofit homeless service provider, is responsible for storing any personal belongings according to Appendix C. The appropriate clean-up entity (based on encampment location; see "Clean-up entity" definition in Appendix A) will conduct any site clean-up necessary after occupants and their personal belongings have been relocated. DPD will also be present to assist with any safety concerns. Depending on the health or safety conditions, other entities may also be engaged to participate.

The recommended relocation time of day is in the morning while occupants are likely still present. Outreach staff shall be present at the commencement of any relocation activities on the date occupant relocation is scheduled to start according to the posted notice, and shall be available to offer shelter alternatives and other services until the relocation is completed. Outreach staff may leave an encampment relocation after outreach services have been refused by all people present at the site. Outreach shall return to a site if an individual requests services before the relocation is completed. It should be emphasized that the day of relocation is not the first time outreach engages with occupants (see Outreach Expectations section above).

The NOAH project and outreach will coordinate who will be onsite to secure property if an individual is not present at the time of relocation. All reasonable steps will be taken to segregate personal property from material that is not personal property, provided that segregation does not pose a danger to the individual sorting the items. Appendix C details what personal property will be stored and in what conditions. After occupants and belongings have been relocated, the clean-up entity may remove and dispose of garbage, debris, waste, and hazardous items.

Post-Relocation Notice

A Post-Relocation Notice (Appendix B) should be posted by outreach in a visible location where the encampment or campsite existed prior to relocation. The notice shall be posted for a minimum of 10 days after the relocation and state:

1. The day relocation was performed
2. Whether personal property was stored by the City
3. Where personal property will be stored
4. How personal property may be claimed by its owner
5. Contact information for an outreach provider that can provide shelter alternatives and help with moving belongings

Personal Belongings Storage & Retrieval

In respecting personal property, approved items (Appendix C) will be stored whether or not occupants are present during the relocation. The NOAH project shall maintain a log of dates and locations of any relocations that occur. Personal property shall be kept for at least 30 days from the date of collection to allow for recovery by its owner. Property left for longer than 30 days from the date it was stored will be disposed of.

Storage and item recovery will be at no cost to the individual that owns the property. Access to belongings will be as low barrier as possible and will not require an identification. Those wishing to collect their belongings can provide a date and location from which the property was taken. Individuals will be asked to describe the personal property with particularity. Personal property that is retrieved will be reflected in the log. Those that need assistance with transporting belongings or going to storage location will be assisted by outreach staff.

Documentation & Evaluation

HRD will gather documentation of the entire relocation process, including the Health & Safety Assessment and recommendation(s), notes from outreach staff, notes from DPD and DHD (submitted via smartsheet), storage logs, and any notes from the clean-up entity.

Within a week of relocation, HRD will schedule a meeting with all entities involved in the relocation to assess any challenges and opportunities for improvement. Improvements to the process and protocol will be made if determined through this process. Part of the ongoing evaluation will be to collect and analyze data on occupants and the results of this protocol (e.g. how many were housed, how many returned to an unsheltered setting, etc.)

EXAMPLES OF IMPLEMENTATION

Examples of how these policies and procedures would be implemented are provided below.

Level 1: Three individuals occupying a site with a severe vermin infestation

Level 1 risks warrant an immediate relocation with a goal of completing the relocation within 48 hours of assessment or sooner if the situation presents an immediate health and safety risk. This example addresses a site with three (3) individuals exposed to high levels of health risks.

Reporting: A resident submits a report to HRD about a site at a park where three people have been sleeping overnight. In the last week, they have noticed that the presence of rats has been growing at the site.

Occupant Engagement & Site Assessment: HRD deploys outreach to assess individuals within 48 hours of report and connect them to resources based on need, including offering shelter. Assessors conduct a Health and Safety Assessment within 48 hours of report and health assessors observe high levels of human and food waste that are attracting rats and other vermin, leading to a severe infestation. Outreach also determines that at least one individual has other health needs and asks for a street medicine team to evaluate the individuals.

Health & Safety Recommendation: Due to the level of infestation, the health assessors conclude that this cannot be mitigated and the occupants need to be relocated and the site cleaned. They recommend a Level 1 emergent relocation to protect the health of occupants and neighbors.

Notification: Written notice is posted at the site within 24 hours of the Level 1 recommendation. Outreach works with individuals to explain the situation and determine next steps to quickly and safely relocate them and their belongings.

Coordination of Relocation Plan: Within 24 hours of recommendation, HRD will work with relevant partners to determine the following next steps:

- HRD schedules a phone call with all relevant partners, including street medicine, to create a relocation plan and ensure relocation occurs within 48 hours
- Outreach continues to work with the individuals to find a safe location (e.g. shelter, friend/family home) for themselves and their belongings, including helping with transportation logistics
- Outreach assesses individuals' needs and ensures connection to resources based on needs and desires of individuals. This can continue after individuals have been safely relocated as a connection to available housing resources is key for long term permanent housing
- The NOAH Project will store any belongings that the individuals are not able to store or take with them at the moment
- Street medicine continues to address health needs and connect individual(s) to other medical resources as needed
- HRD, outreach, and DPD confirm successful relocation with all partners prior to scheduling the cleaning of the site

Level 2 Site Example: One individual occupying a site scheduled for construction

As outlined in the policy, scheduled construction does not require a health and safety assessment, but does warrant relocation of occupants due to safety hazards caused by construction. This example addresses needs for a site of one (1) individual.

Reporting: Construction on a site is being scheduled. Following protocol, the construction permit process includes a report of any unsheltered individuals, which is submitted to HRD 30 days in advance of construction start date as required.

Occupant Engagement & Site Assessment: HRD deploys outreach to assess individual within 48 hours and connect them to resources based on need, including offering shelter. Given the safety hazards caused by construction, an assessment is not needed per this policy and a relocation is warranted.

Health & Safety Recommendation: The recommendation in the case of construction is automatically relocation.

Notification: Written notice is posted at the site and outreach works with individuals to explain the situation and determine next steps to safely relocate them and their belongings.

Coordination of Relocation Plan: Within 48 hours, HRD will work with relevant partners to determine the following next steps:

- HRD schedules a phone call with all relevant partners, including City departments involved in the scheduling and execution of demolition, to create a relocation plan and ensure relocation occurs before any demolition
- Outreach continues to work with the individual to find a safe location (e.g. shelter, friend/family home) for themselves and their belongings, including helping with transportation logistics

- Outreach assesses individual's needs and ensures connection to resources based on needs and desires of individuals. This can continue after individuals have been safely relocated as a connection to available housing resources is key for long term permanent housing
- The NOAH Project will store any belongings that the individual is not able to store or take with them at the moment
- HRD, outreach, and DPD confirm successful relocation with all partners prior to construction

Level 2 Encampment Example: Eight individuals occupying a space with fire hazards

Level 2 risks do not warrant an emergent relocation and are completed 14 calendar days post assessment. This example is for an encampment (i.e. 4 or more individuals) of eight (8) individuals, which requires a higher level of coordination.

Reporting: Eight (8) individuals are occupying a public space during winter and residents have reported fires at the encampment. DPD, DFD and DHD conduct site assessment and submits the recommendation report to HRD.

Occupant Engagement & Site Assessment: HRD deploys outreach to assess individuals within 48 hours and connect them to resources based on need, including offering shelter. Assessors conduct a Health and Safety Assessment within 48 hours of report and determine that there are man-made structures made with flammable materials and having open fires poses a safety risk to occupants. Occupants need a source of heat during winter temperatures, but a safe option is not found for this location.

Health & Safety Recommendation: Due to low winter temperatures, assessors recommend that if a safe source of heat cannot be located, a Level 2 relocation of occupants is necessary.

Notification: Within 48 hours of assessment, written notice is posted at the site and outreach works with individuals to explain the situation and determine next steps to safely relocate the individuals and their belongings within the next 14 days.

Coordination of Relocation Plan: HRD will work with relevant partners to determine the following next steps:

- HRD schedules a phone call with all relevant partners to create a relocation plan for each individual and to discuss steps to ensure their safety before the relocation takes place. Due to temperatures, shelter options are discussed with individuals. Individuals state that they would like to remain together if they have to relocate. HRD works with CAM and shelter partners to find shelter space that can accommodate all occupants
- Outreach continues to work with the individuals to find a safe location (e.g. shelter, friend/family home) for themselves and their belongings, including helping with transportation logistics
- Outreach assesses individuals' needs and ensures connection to resources based on needs and desires of individuals. Connection to available housing resources is key for long term permanent housing
- The NOAH Project will store any belongings that the individuals are not able to store or take with them at the moment
- During and after relocation, HRD and CoC partners will continue to work on housing resources for individuals based on needs and interest. HRD may consult with State partners to address resource gaps

SOURCES

This document was created as a joint effort between the City, the homelessness response system, and other key partners by using the following sources:

- City of Portland Homelessness Toolkit: <https://www.portlandoregon.gov/toolkit/>
- City of Seattle's Homelessness Response and Encampment Abatement Program: <https://www.seattle.gov/homelessness/unauthorized-encampments>
- Los Angeles Homeless Services Authority: Guiding Principles and Practices for Local Responses to Unsheltered Homelessness: <https://www.lahsa.org/documents?id=2951-guiding-principles-and-practices-for-unsheltered-homelessness.pdf>
- U.S. Interagency Council on Homelessness: *Ending Homelessness for People Living in Encampments: Advancing the Dialogue*
https://www.usich.gov/resources/uploads/asset_library/Ending_Homelessness_for_People_Living_in_Encampments_Aug2015.pdf

APPENDIX A. DEFINITION OF TERMS

Terms used throughout this document are defined here for the sake of clarity.

Abandoned - Personal property in a public place or on City property is presumed to be abandoned by the owner or custodian so as to permit an authorizing official to take custody when:

- a) The property is placed out for collection in conjunction with solid waste or recyclable material on the scheduled date for City collection, or it is placed there on a date contemporaneous with a community collection or clean-up;
- b) The property is not associated with an encampment and a reasonable person would not allow the property to be there unattended for the length of time the property has been there, considering the location of the property on the sidewalk, roadway, or other City property, the type of property, the danger of theft, and the risk of damage from weather;
- c) No name appears on the property and the occupant or owner of the adjacent land or building on inquiry disclaims ownership; or
- d) The property is unattended on a sidewalk, planting strip adjoining a park, in a park drive or boulevard, or in a roadway/right of way.

Clean-up - An effort related to cleaning up any discarded garbage after encampment occupants have been relocated and approved personal belongings have been stored.

Clean-up entity - An entity that is charged with cleaning up encampment sites after occupants and their belongings have been relocated. Various clean up entities (e.g. Downtown Detroit Partnership, Detroit Public Works, General Services Department) are charged with regular cleaning and upkeep of Detroit depending on location. The correct clean up entities will be contacted to provide clean up depending on the encampment site location and type.

City - Refers specifically to the City of Detroit.

City property - City buildings and adjacent premises owned or occupied by the City, and any land, buildings, or facilities owned by, operated by, or under the jurisdiction of a City department.

Contraband - Any property that is unlawful to produce or to possess.

Encampment - is multiple sites composed of four or more occupants and/or tents

Garbage or refuse - Any item that, in its present condition, has no apparent utility to a reasonable person.

Hazardous items - An item that reasonably appears to pose a health or safety risk to members of the public, City employees, or other authorized personnel. Hazardous items may include blankets, clothing, sleeping bags, or other items depending upon their condition and site conditions.

Health official - A Detroit Health Department official that will assess health conditions of the encampment site in order to make a recommendation, if necessary, to address health concerns. This assessment is completed jointly with a Detroit Police Department officer (see Safety Official).

Occupant - Any individual using an unsheltered setting not meant for human habitation for overnight shelter.

Outreach - Continuum of Care homelessness providers that engage unsheltered individuals, including encampment occupants, with the purpose of connecting them to services and resources as determined by their individualized needs. Continuum of Care providers include those that are funded by the U.S. Department of Housing and Urban Development and the Michigan Department of Health and Human Services.

Personal property - An item that:

1. Is reasonably recognizable as belonging to a person;
2. Has apparent utility in its present condition; and
3. Is not hazardous.

Examples of personal property include, but are not limited to, vital documents (e.g. birth certificates, state identification), tents, bicycles, radios, electronic equipment, eyeglasses, prescription medications, photographs, jewelry, crutches, and wheelchairs. Personal property does not include building materials such as wood products, metal, pallets, or rigid plastic. The authorizing official should resolve a reasonable doubt as to whether an item is personal property in favor of deciding the item is personal property, and treat it in accordance with this policy.

Reasonable person - A phrase frequently used in tort and criminal law to denote a hypothetical person in society who exercises average care, skill, and judgement in conduct and who serves as a comparative standard for determining liability.

Relocation - The scheduled move of encampment occupants and their belongings, whenever possible, when an encampment poses high levels of health and safety risks as determined by health and safety officials.

Safety official- A Detroit Police Department officer that will assess safety conditions of the encampment site in order to make a recommendation, if necessary, to address safety concerns. This assessment is completed jointly with a Detroit Health Department official (see Health Official).

Site - one or more tent, structure, or assembly of camping equipment or personal property that appears to a reasonable person to be used for overnight shelter

Structure, tents, and other shelters- Anything constructed or erected on or under the ground, or any improvement built up or composed of parts joined together in some definite manner. Structures include, but are not limited to, buildings, lean-tos, tents, awnings, pallets, and tarps.

Unsheltered Homelessness- add definition once finalized

APPENDIX B. RELOCATION NOTICES

Scheduled Relocation Notice

NOTICE: Scheduled Encampment Relocation

Date Posted: MONTH, DAY, YEAR

The Detroit Health Department and the Detroit Police Department visited this site on MONTH, DAY, YEAR. They found health and safety risks to those staying here. For your safety, moving will need to take place.

Date of Relocation: MONTH, DAY, YEAR

Time: TIME-TIME AM

For help moving to a safe place, call outreach at 313-481-1200 (Monday, Wednesday, Thursday, Friday, Sunday) or 313-424-2202 (Tuesday, Saturday).

All personal property on this site must be moved by RELOCATION DATE.

Post-Relocation Notice

Encampment Relocation Notice

Date Posted: MONTH, DAY, YEAR

The Detroit Health Department and the Detroit Police Department visited this site on MONTH, DAY, YEAR. They found health and safety risks to those staying here. For the safety people staying here, people and their belongings were moved on MONTH, DAY, YEAR.

What happened to personal property?

All personal property was removed before relocation; No personal property storage was necessary

Personal property was stored at the NOAH Project (23 E. Adams near Comerica Park). It can be picked up during Mon-Thurs 9am-4pm or Fridays by appointment (call 313-965-5422 and ask for NOAH staff). All personal property must be picked up by MONTH, DAY, YEAR.

Personal property found on site was not stored due to _____.

Outreach providers can help to pick up items and can be reached at 313-481-1200 (Monday, Wednesday, Thursday, Friday, Sunday) or 313-424-2202 (Tuesday, Saturday).

APPENDIX C. STORAGE POLICY

Mandatory Storage Policy

All property collected placed into a bag and labeled with date, location, and individual's name (if available).

The following items must be stored *regardless of condition*:

- Prescribed medication (non-narcotic)
- Any form of personal identification (i.e. driver's license, Social Security card, birth certificate, passport, Detroit ID Card, etc.)
- Tools (not every nut and bolt, but the necessary ones)
- Cell phones/computers/electronic devices

The following items will be stored if conditions are not cause for public health concern (e.g. covered in mold):

- Tents
- Sleeping bags/blankets
- Boots/shoes
- Backpack/purse (note, if a backpack or purse is not able to be stored, items contained inside will be still be stored)
- Bike (only if operable and in working order)

Items that Cannot be Stored

- No pets
- No food nor liquids of any type
- No perishable items of any type
- No water-logged items
- No Items soiled/stained with human or animal/waste/blood/or unknown substance(s)
- No Items with vermin, bugs, insects, etc.
- No gasoline/kerosene/lighter fluid in any type of container
- No empty gasoline cans or empty gasoline containers of any type
- No empty lighter fluid containers of any type
- No propane tanks, charcoal, cooking/heating briquettes, wood chips, or wood pellets
- No matches or lighters (electric or battery powered included)
- No fire extinguishers
- No portable or makeshift toilets
- No weapons of any type, including items made into weapons
- No ammunition or explosives of any type
- No shopping carts
- No controlled substances
- No drug paraphernalia
- No illegal substances
- No chemicals (liquid or powder), including bleach (liquid or powder), ammonia, and other hazardous materials
- No environmental pollutants
- No cardboard or building material of any type, including lumber and wooden pallets

APPENDIX D. HEALTH & SAFETY ASSESSMENT

DETROIT CONTINUUM OF CARE

ENCAMPMENT HEALTH & SAFETY ASSESSMENT

ASSESSMENT DATE:	ASSESSOR NAME: Department: _____ Phone: _____ Email: _____
REPORTING ENTITY: REPORT DATE:	ASSESSOR NAME: Department: _____ Phone: _____ Email: _____
LOCATION & SITE ACCESSIBILITY	
Location description (e.g. cross-streets, nearby address and/or landmark):	
Accessibility by emergency services:	
Distance from mainstream and/or homelessness services:	
Proximity to vulnerable populations (e.g. schools, playgrounds, nursing homes):	
Type of Site: (check one, include name if available)	
<input type="checkbox"/> Sidewalk <input type="checkbox"/> Doorway/step: _____ <input type="checkbox"/> Roadway <input type="checkbox"/> Park: _____ <input type="checkbox"/> Steep Slope <input type="checkbox"/> Other Public Space: _____ <input type="checkbox"/> Highway Shoulder <input type="checkbox"/> Other City-Owned Property: _____ <input type="checkbox"/> Off-Ramp <input type="checkbox"/> Other Private Property: _____	
Structure(s) & Bulky Items (include the number of each type of structure present): Tent___ Man-Made___ Shopping Carts___ Crates___ Other ___ Description:	
Is imminent work or an event scheduled at this site? (e.g. construction, landbank sale) ___no ___yes If yes, date: _____ Description:	
Do existing or imminent weather conditions (e.g. temperature, precipitation, windchill) present health and safety concerns to occupants? ___no ___yes If yes, describe:	
Other Notes:	
OCCUPANT INFORMATION	
Estimated number of occupants:	
Number of people within observed age ranges: 0-5___ 6-12___ 13-17___ 18-35___ 36-55___ 56-75___ 76+___	
Number of gender observed: male___ female___ other___ Observed languages spoken:	
Are there indications that children may be present (e.g. children's clothing, toys, diapers, etc.)? ___no ___yes If yes, describe:	
Are there indications that any occupants may have medical conditions (e.g. wheelchairs, oxygen tanks, medications)? ___no ___yes If yes, describe:	
Are there indications that an occupant is a potential health or safety risk to themselves or other (e.g. self-harm, violent behavior)? ___no ___yes If yes, describe:	

Do occupants have pets? no yes If yes, describe (number, species, apparent health conditions):

Other Notes:

HEALTH & SAFETY CONDITIONS

DIRECTIONS:
For all health and safety criteria, indicate level of condition observed & provide a description if condition is present
KEY FOR CONDITIONS OBSERVED:
None Observed (NO)- Condition listed not observed, no action required. Outreach engages to assess occupant needs
Low Levels (LL)- Levels are low, no imminent action required. Outreach engages to assess occupant needs
Moderate Levels (ML)- Levels are moderate, mitigation strategy may be recommended to decrease or address levels. Outreach and other appropriate departments engaged if necessary
High Levels (HL)- Levels are a risk to the residents; Recommendations will be made to address risk(s). Outreach and other appropriate departments engaged

HEALTH CONDITIONS

Garbage/debris present (e.g. food waste): **CONDITIONS OBSERVED: NO LL ML HL**
Description:

Bio-hazards present: **CONDITIONS OBSERVED: NO LL ML HL**
Human feces human vomit drug paraphernalia (e.g. sharps)
Other:
Description:

Is encampment associated with a reported disease outbreak? no yes
If yes, include report date: **CONDITIONS OBSERVED: NO LL ML HL**
Report details:

Do occupants present indications of any contagious disease? no yes
Describe:

Presence of vermin (e.g. mice, rats, mosquitos, ticks, cockroaches): **CONDITIONS OBSERVED: NO LL ML HL**
no yes If yes, describe:

If vermin harborage present (i.e. conditions that result in infestation), describe:

Number of bathrooms observed (e.g. shallow pit latrine, porta potty): _____
Describe type(s):

Number of hand washing facilities/sanitary stations present: _____
Description:

Other Notes:

SAFETY CONDITIONS	
Fire risks present (e.g. open fires, flammable objects, cramped spaces):	CONDITIONS OBSERVED: <input type="checkbox"/> NO <input type="checkbox"/> LL <input type="checkbox"/> ML <input type="checkbox"/> HL
Description of any criminal activity or violence reported or observed (beyond illegal drug use): <input type="checkbox"/> reported <input type="checkbox"/> observed Description:	CONDITIONS OBSERVED: <input type="checkbox"/> NO <input type="checkbox"/> LL <input type="checkbox"/> ML <input type="checkbox"/> HL
Exposure to moving vehicles: Description:	CONDITIONS OBSERVED: <input type="checkbox"/> NO <input type="checkbox"/> LL <input type="checkbox"/> ML <input type="checkbox"/> HL
Observed structural integrity: Description:	CONDITIONS OBSERVED: <input type="checkbox"/> NO <input type="checkbox"/> LL <input type="checkbox"/> ML <input type="checkbox"/> HL
Interference with pedestrian safety (e.g. sidewalk obstruction, blocking building access): Description:	CONDITONS OBSERVED: <input type="checkbox"/> NO <input type="checkbox"/> LL <input type="checkbox"/> ML <input type="checkbox"/> HL
Presence of weapons: <input type="checkbox"/> no <input type="checkbox"/> yes If yes, describe:	CONDITIONS OBSERVED: <input type="checkbox"/> NO <input type="checkbox"/> LL <input type="checkbox"/> ML <input type="checkbox"/> HL
Other Notes:	

ASSESSMENT DETERMINATION

DIRECTIONS: Assessors determine a recommended action and include any accompanying recommendations as needed, including other entities for engagement. A summary of the reasons for the recommendation(s) is also included.

RECOMMENDED ACTION:

- No action needed beyond outreach engagement of residents
- Recommendations below will address moderate levels of risks; further action may be required if risks are not mitigated by the following date: _____
- Initiate encampment move protocol at the following level:
 - Level 1- emergent move completed within 48 hours
 - Level 2- non-emergent move completed within 14 calendar days

ACCOMPANYING RECOMMENDATIONS:

RECOMMENDED DEPARTMENTS/ENTITIES FOR ENGAGEMENT:

SUMMARY OF REASONS FOR RECOMMENDATIONS: