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9 **Complaint and Request for Review of Decision Concerning**
10 **Luke-Dorf’s Hillsboro Treatment Facility Complex**

11 **Introduction**

12 The Hillsboro Neighborhoods Coalition submits this complaint under
13 Oregon Administrative Rule OAR 415.012.0080 in response to the decision
14 documented in “Addictions and Mental Position Statement on licensing
15 requirements for Hartner House and Safe Haven” (Attachment A).
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18 For many months before filing this complaint and as required by the
19 rule, the coalition has tried to work in good faith with Luke-Dorf and other
20 Hillsboro and Washington County stakeholders to understand the
21 operations at the Luke-Dorf treatment facility complex. (Attachment B,
22 Community Safety Meeting agendas and notes). The group’s efforts
23 included organizing and hosting two public meetings and a lengthy dialog
24 with Luke-Dorf regarding a so-called “Good Neighbor Agreement.” The
25 coalition’s attempts to negotiate a solution to the problems caused by the
26 Luke-Dorf treatment complex have been rebuffed. Therefore, the coalition
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1 invokes the administrative complaint procedure to ask the OHA Director's
2 office to intervene and review this matter so that litigation may be avoided.

3 By rule, OAR 415.012.0080(1)(b), any person may bring such a
4 complaint:

5 (1) Investigation of Complaints: Any person who believes that
6 administrative rules have been violated may file a complaint
7 with the Division . . .

8 (b) The Division shall investigate complaints and notify the
9 provider of the results of the investigation and any proposed
10 action.

11 **Relief Requested**

12 The Hillsboro Neighborhoods Coalition requests that the Director of
13 Oregon Health Authority investigate the operations and review the statutes
14 and rules for residential facility licensing in Oregon, particularly as applied
15 to the Luke-Dorf treatment facility complex in Hillsboro, Oregon. The
16 coalition has (and submits as attachments to this complaint) substantial
17 evidence that OHA's position that the Luke-Dorf facility is not required to
18 complete state licensing as a treatment facility is in error.

19 The coalition further requests that, to correct this error, OHA require
20 the Luke-Dorf Hillsboro facility to obtain appropriate licensure and impose
21 penalties as prescribed in ORS 443.911 if the facility operator will not come
22 into compliance.

23 The coalition also asks that OHA coordinate and lead a review of the
24 Washington County systems and procedures for ensuring appropriate
25 oversight and licensing of mental health and addiction treatment providers.
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1 Because the decision challenged here originated within an OHA
2 division (Addictions and Mental Health, Attachment C, 17 August 2011), the
3 coalition asks that the Director's office retain responsibility for this
4 investigation and appoint a liaison to work with the coalition until reaching
5 a final decision on the complaint.

6 7 **History of the Problem**

- 8 1. Luke-Dorf, Inc., is an Oregon non-profit corporation (Oregon
9 Business Registry 122738-19) that owns and operates a 24-bed dual-
10 diagnosis residential facility in the city of Hillsboro. The facility
11 complex consists of two residential treatment programs offered in
12 two structures, the 10-bed Safe Haven structure and the 14-bed
13 Hartner House structure. At this complex, Luke-Dorf provides room,
14 board, and an array of care and treatment services for persons in
15 Washington County who are chronically homeless, persistently
16 mentally ill, and/or drug addicted.

- 17
18 2. The Luke-Dorf facility also offers a prison reentry housing program
19 for convicts released from the Oregon Department of Corrections and
20 Washington County jail. Various county agencies, including
21 Washington County Housing, Community Corrections, and Health
22 and Human Services, participated in developing the facility complex
23 and securing public funding for it.
24

- 1 3. On two separate occasions, a criminal offender released to reside at
2 Luke-Dorf left the complex and committed violent sexual assaults,
3 raping a young woman and sexually assaulting a young child, before
4 returning to the facility (Attachment D, Court Transcript Excerpt).
5
- 6 4. Hillsboro neighborhood associations responded to the sexual assaults
7 against Hillsboro residents by hosting two public meetings to address
8 Luke-Dorf's failures to properly supervise its residents. At one of
9 those meetings, Luke-Dorf's top official stated that "Luke-Dorf staff
10 members along with a county judge, probation officer and a
11 representative from the district attorney's office reviewed Heath's
12 records and believed Luke-Dorf was a good place for him"
13 (Attachment E, Oregonian article).
14
- 15 5. After these vicious sexual assaults, Hillsboro residents learned that
16 the Luke-Dorf treatment facility complex has no state license and is
17 free of any state oversight or inspections.
18
- 19 6. The Luke-Dorf resident who left the treatment complex to commit the
20 sexual assaults and then returned to it after each one pleaded guilty to
21 two counts of first-degree rape, one count first-degree unlawful
22 sexual penetration, four counts of first-degree sex abuse, four counts
23 of first-degree attempted sodomy, and seven counts of first-degree
24 burglary. The court sentenced him to almost 38 years imprisonment.
25 During the sentencing process, an assistant district attorney
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1 commented that Luke-Dorf staff were “highly uncooperative” towards
2 police, who tracked a cell-phone stolen during one of the assaults to
3 the Luke-Dorf treatment facility complex and asked to speak with
4 facility residents (Attachment F, Sentencing hearing transcript).

5
6 7. At a second public meeting about the assaults, in October 2010, a
7 Hillsboro Police lieutenant stated that federal health information
8 privacy laws prevent the police from knowing who resides at the
9 Luke-Dorf treatment facility (Attachment B).

10
11 8. As a result of the problems originating with the Luke-Dorf facility,
12 concerned citizens formed the Hillsboro Neighborhoods Coalition.
13 The coalition attempted to work with Washington County, Luke-Dorf,
14 and the City of Hillsboro to create and agree on protocols that would
15 let the facility attain its treatment goals while protecting the facility’s
16 neighbors. However, Luke-Dorf refuses to explain the nature of their
17 operations and service elements provided (Attachment G). Since
18 October 3, 2011, Luke-Dorf has refused all requests to continue dialog
19 with the coalition.
20

21
22 9. On August 4, 2011, OHA staff toured the Hillsboro Luke-Dorf
23 complex. After the tour and review of information provided to it by
24 Luke-Dorf, AMH affirmed its prior, undocumented decision that the
25 Luke-Dorf treatment facility complex did not and does not require
26 any licenses or outside supervision to operate.
27

1 **Applicable Statutes and Rules**

2 **Statutes**

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- 4
- 5 1. ORS 443.400(6) defines residential facilities as “residential care
- 6 facility, residential training facility, and residential treatment facility,
- 7 residential training home or residential treatment home.”
- 8
- 9 2. ORS 443.400(9) defines residential treatment facilities as “a facility
- 10 that provides, for six or more individuals with mental, emotional or
- 11 behavioral disturbances or alcohol or drug dependence, residential care and
- 12 treatment in one or more buildings on contiguous properties.
- 13
- 14 3. ORS 443.410:
- 15 (1) A license issued by the Department of Human Services is
- 16 required in order to operate or maintain a residential care
- 17 facility, residential training facility or residential training home.
- 18 In the case of a combination of residents, the category of
- 19 licensure shall be determined by the Director of Human
- 20 Services.
- 21 (2) A license issued by the Oregon Health Authority is required
- 22 in order to operate or maintain a residential treatment facility
- 23 or residential treatment home.

24 **Administrative Rules**

- 25 1. OAR 309-305-0110: “(1) License Required. . . . No person or
- 26 governmental unit acting individually or jointly with any other person
- 27

1 or governmental unit will establish, maintain, manage, or operate a
2 Residential Treatment Facility without a license issued by the
3 Division.”

- 4
- 5 2. OAR 415-012-0020(3)(a): “No individual or entity shall represent
6 themselves as a residential treatment facility for alcohol or drug-
7 dependent persons or as a detoxification center without first being
8 licensed.”
- 9

10 **Summary of Argument**

11 The Hillsboro Neighborhoods Coalition argues that OHA/AMH made
12 a serious error in acceding to Luke-Dorf’s desire to operate an unlicensed
13 residential treatment facility in central Hillsboro without state oversight.

14 Evidence that the coalition has collected from Luke-Dorf and local
15 officials show that, *in every meaningful respect, the Luke-Dorf Hillsboro*
16 *complex is a residential treatment facility in all but name*, and that
17 OHA/AMH can only justify its position by turning a blind eye to the
18 treatment services actually provided at the complex. The Luke-Dorf
19 treatment facility complex located at the SW corner of 5th and Washington
20 Street in Hillsboro is an unlicensed residential treatment facility in
21 violation of ORS 443.410 and OARs 415-012-0020 (3)(a) and 309-305-
22 0110.

23

24 The remarkably cursory, daytime-only, review of the Luke-Dorf
25 operations by an AMH interim manager, “in his free time” (Attachment C)
26 was a wholly inadequate response to the brutal assaults committed by a
27

1 Luke-Dorf resident. Moreover, the review relied on unsubstantiated claims
2 by Luke-Dorf staff that were not independently verified and that directly
3 conflict with other statements by Luke-Dorf and local government staff
4 concerning the facility. Therefore, OHA should conduct an in-depth
5 investigation, led by the director's office, to learn how and why the laws and
6 rules intended to protect the public broke down so badly in this case.

7 There are four major lines of argument in support of the Coalition's
8 assessment. First, AMH's approach of viewing the Luke-Dorf facility to a
9 standard commercial multi-unit housing facility is refuted by the fact that
10 other residential facilities also use leases for contracting with clients.
11 Second, AMH's review assumed, *a priori*, that Luke-Dorf was not a
12 residential treatment facility, rather than looking at the evidence about the
13 treatment services to decide the property classification. Third, Luke-Dorf
14 publicly touted itself as a residential treatment facility. And, fourth, public
15 agencies seeking funds and support for the facility touted it for the
16 residential treatment services to be provided there.

17
18 **Specific arguments**

19
20 **Similarities to Conventional Leased Apartments are Not**
21 **Relevant to Whether Luke-Dorf is a Residential Facility**

22
23 The AMH memo (Attachment A) points to certain aspects of the
24 Luke-Dorf operation to suggest that the resident-clients are simply tenants
25 in a residential apartment complex, citing the resident-clients' ability to
26 function independently. However, the memo contradicts itself on this
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1 issue, and fails to address readily available public records that disprove this
2 approach. In the “AMH Program Observations” section, the author writes
3 that “tenants *were described* as being independent in their activities of
4 daily living” (italics added). The passive voice conceals the identity of those
5 providing that description. And the memo goes on to note that, unlike a
6 typical landlord/tenant setting, at the Luke-Dorf complex,

7
8 Room cleaning assistance is offered by staff three times per
9 week.

10 Staff were observed onsite . . . preparing meals.

11 Medications are stored by program staff and distributed to
12 tenants in accordance with physician orders. *While this*
13 *medication practice mirrors Luke-Dorf’s practices in the*
14 *licensed residential settings, the rationale behind the practice*
15 *is related to program safety (to ensure medications are not*
16 *misused, stolen, or sold [Attachment A, emphasis added.]*

17 The Legislature did not provide an exemption to allow the intention
18 of those administering medications to determine whether state licensing
19 regulations had to be followed. Rather, the Legislature deemed that
20 facilities that manage medications should obtain a license and be subject to
21 state oversight.

22 Furthermore, the report acknowledges that “*medications are stored*
23 *by program staff and distributed to tenants in accordance with physicians*
24 *orders*” and “*on occasion, depending on an individual’s needs, Luke-Dorf*
25 *clinicians will provide mental health services within the programs*” (italics
26
27

1 added). Indeed, in describing itself, Luke-Dorf acknowledges that it is
2 providing “*case management, coordination of medical needs, life skills*
3 *training, connection to social supports and more.*” Regarding the Hartner
4 House program, Luke-Dorf notes that “Residents are supported through
5 evidence based practices that integrate *mental illness and substance abuse*
6 *services* with life skills, employment supports and more” (italics added).

7 Significantly, unlike most landlord-tenant arrangements available to
8 Oregonians, at the Luke-Dorf treatment facility complex, residents are not
9 expected to care for themselves. Rather, the expectation is that “residents
10 will be encouraged to care for their own needs to the extent possible” (OAR
11 309-035-0165). Adult tenants living in a facility that prepares their meals,
12 helps them clean their living units, and manages their medications are
13 evidently not “independent in their activities of daily living.” Rather, they
14 are clients of the facility providing such help, care, treatment, and support
15 until they achieve independence.

16 Although AMH notes that “all tenants reportedly maintain their own
17 lease for room and board,” the passive voice again obscures whether this
18 claim should be taken at face value. Also unclear is whether that is relevant
19 to the main issue: Whether, based on the services it provides, Luke-Dorf
20 must be licensed. Under OAR 309-035-0113, residential facilities may
21 require leases, and residencies at residential facilities may be terminated
22 with 30 days notice for non-payment of fees or other issues per OAR 309-
23 035-0150. Therefore, there is nothing about the use or failure to use leases
24 with Luke-Dorf treatment facility clients that takes the operation out of the
25 definition of a residential facility.
26

1 **AMH First Assumed that Luke-Dorf Was Not a Residential**
2 **Facility to Decide Whether Luke-Dorf Was a Residential Facility.**

3 Despite contrary claims, Luke-Dorf is a residential facility that
4 provides care and treatment to resident-clients a “24/7 basis,” and it does
5 so “in accordance with a residential plan.”

6 The “Conclusion” section of the AMH memorandum makes two
7 critical claims:

8
9 1) Luke-Dorf’s Safe Haven and Hartner House do not meet the
10 statutory definition of a residential treatment facility because
11 they do not provide ‘residential care’ and ‘treatment’ on a 24/7
12 basis,

13 and

14 2) “Neither Hartner House nor Safe Haven provide these
15 specific services in accordance with a residential plan as defined
16 by applicable administrative rule, and therefore do not meet the
17 definition of a residential treatment facility.” [Attachment A.]

18 In support, the memo cites the definition given at OAR 309-035-
19 0105(36): “Residential Treatment Facility (RTF)’ means a facility that is
20 operated to provide services on a 24-hour basis for six or more residents.”

21 Significantly, the memo notes that the Luke-Dorf facility has “support
22 staff on-site 24/7.” And the Luke-Dorf CEO has assured the Hillsboro
23 public that there was staff on site at all times. This is consistent with
24 advertising from the operator, which call for applications for awake night
25 shift “residential counselors.” A recent Luke-Dorf job posting on November
26 3, 2011, seeks an “On-Call Residential Counselor” for all shifts (7 am-3 pm,
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1 3 pm-11 pm, and 11 pm-7 am; Attachment H, Job Postings). At Luke-Dorf,
2 all shifts are specifically designated as “awake.” The duties include “crisis
3 intervention,” “distribute medication in accordance with physicians
4 orders,” and “arbitration of disputes among residents.”

5 Despite the claim that “the [Luke-Dorf] program does not develop a
6 residential service plan, or plan of any kind, to direct supports offered by
7 the program,” the critical question is not whether Luke-Dorf develops a
8 care plan; rather, it is whether the facility *carries out* such plans. A Luke-
9 Dorf employment posting for a “house manager” position at the complex
10 (Attachment H, 18 January, 2011) gives these job responsibilities “Assist
11 individuals with household tasks and treatment goals, ***as determined by***
12 ***each individual residential service plan***” and “***Complete***
13 ***residential service plan 30-day summaries on a monthly basis.***”
14

15 Thus, Luke-Dorf’s own statements and practices show that the facility
16 does indeed provide “housing” and “support services” to those struggling
17 with mental illness and substance abuse disorders, with staff available at all
18 times to provide crisis intervention, medication dispensing, arbitration
19 between residents, meals, life skills training, connection to social supports,
20 assistance obtaining benefits and other services as needed. Thus, the
21 complex is a facility providing “services” on a 24/7 basis, OAR 309-035-
22 0105(36). That care plans are developed offsite is irrelevant to the licensing
23 question, which is about services provided onsite in accordance with a
24 residential plan.
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1 In sum, AMH failed to note clear and convincing evidence that Luke-
2 Dorf operates a residential facility in Hillsboro that requires a state license,
3 because Luke-Dorf provides care and treatment services on a “24/7 basis”
4 and does so “in accordance with a residential plan.”

5
6 **The Coalition Agrees with Luke-Dorf and its Partners: the
7 Hillsboro Complex Is a Residential Treatment Facility**

8 One important test for spotting a treatment facility: Whether the
9 operator represents the facility as such.

10 No individual or entity shall represent themselves as a
11 residential treatment facility for alcohol or drug-dependent
12 persons or as a detoxification center without first being
13 licensed. [OAR 415-012-0020 (3)(a).]

14 Luke-Dorf and public agencies often represent the Hillsboro complex
15 as a residential facility providing treatment for alcohol and drug dependent
16 persons. The coalition agrees that this is accurate. Just a few of many
17 examples of such representations:

18
19
20 1. City of Hillsboro planning documents for the Luke-Dorf facility state
21 that the intent of the complex is to operate as a residential facility
22 providing treatment for individuals suffering from mental illness and
23 addictions (Attachment I. Hillsboro Planning Documents).

24
25 2. Luke-Dorf CEO Howard Spanbock wrote that

26 Our vision also included creating a freestanding 15-bed building
27

1 dedicated to dually diagnosed clients, where we could practice
2 evidence-based integrated dual-diagnosis treatment for
3 individuals referred for the most part by corrections programs,
4 emergency departments, and jails. [Attachment J, Behavioral
5 Health Care, April 2008.]

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3. An Oregonian article quotes Spanbock, referring to what is now called the Hartner House, as a “dual diagnosis treatment facility.” The same article further states “Treatment at a place such as the new facility will help those people and relieve burdens on emergency rooms, public services and the corrections system, Spanbock said.” (Attachment K, Oregonian article.)

4. The Luke-Dorf website states:

The Hillsboro Graduated Independent Living Program (HGILP) is a 14 bed Permanent Supported Housing program situated in the recently constructed Hartner House. The program is dedicated to the unique needs of chronically homeless adults struggling with co-occurring mental illness and substance use **disorders**.

Specific goals of the program are to reduce homelessness, substance abuse, and mental health problems; to improve life skills and functioning; and to reduce interactions with the criminal justice system. These goals are achieved through **evidence based practices that integrate mental illness and substance abuse treatment** with life skills, employment supports and more.” [Attachment L, Luke-Dorf website, http://www.luke-dorf.org/supportive_housing.php], accessed on April 15, 2011 (emphasis added).]

1 The website describes Safe Haven program as offering "... a setting
2 with low demands, but high expectations for growth and recovery. . . . In
3 addition, the house shares a campus with *Hartner House, which offers*
4 *a variety of group and individual treatment options.*" (Emphasis
5 added.)
6

7 **Washington County Recognized the Luke-Dorf Hillsboro** 8 **Complex as a Residential Treatment Facility from Inception**

9 Washington County's public representations about the Luke-Dorf
10 facility are pertinent under OAR 415-012-0020 (3)(a), discussed above:
11

- 12 1. A staff report to the Hillsboro Finance Committee states that the City
13 awarded a \$30,000 grant to Luke-Dorf *for the provision of 15*
14 *residential treatment facility beds* in the 2006-2007 financial
15 year. [Attachment M, City of Hillsboro Finance Committee Memo
16 (emphasis added).]
17
- 18 2. Washington County touts the Luke-Dorf treatment complex as a
19 residential facility providing mental health and addiction treatment
20 services with a significant population transitioning from the judicial
21 system, referring to Luke-Dorf as "a 15-bed *residential program*
22 *that will treat mentally ill and chemically dependent*
23 *members of our community.* This dual-diagnosis facility, which
24 will be operated by Luke-Dorf, is a companion program to the 10-bed
25 mental health facility designed to work with the homeless
26
27

1 population.” (Attachment P, WCCC 2007-2009 Biennium Plan p.2,
2 emphasis added)

3
4 3. “In addition, Luke-Dorf, Inc. owns and operates the Graduated
5 Independent Living facility, **a treatment facility with 15 beds**
6 **for clients with a dual diagnosis of chronic mental illness**
7 **and drug or alcohol addiction.”** (Attachment O, Washington
8 County Consolidated Plan 2010-2015, p.73, emphasis added.)
9

10 4. In Appendix B of the County’s 10-year plan to end homelessness the
11 Hartner House program is described as “Permanent housing for
12 homeless individuals with dual diagnosis. **Intensive treatment on**
13 **site.”** (Attachment Q. Washington County 10 Year Plan to End
14 Homelessness 2008-2018, emphasis added.)
15

16 This sampling of statements from Washington County agencies shows
17 that the county is clearly – and appropriately, in the coalition’s opinion – a
18 public partner working closely with Luke-Dorf to provide residential
19 treatment services to very needy individuals. What is inappropriate,
20 however, is for Washington county and the provider to repeatedly promote
21 the facility as a treatment facility when seeking funds, while pretending to
22 be other than a residential treatment facility when it comes to licensing
23 requirements.
24

1 **CONCLUSION**

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4 The Hillsboro Neighborhood Coalition is not a NIMBY (“not in my
5 backyard”) group. The coalition does not object to a properly licensed and
6 monitored residential treatment facility offering treatment services to help
7 people afflicted with drug addictions, mental illness, or both.

8 What concerns the coalition and its members is that Luke-Dorf has,
9 so far with success, managed to have it both ways on services and licensing:
10 When it comes to the treatment services it provides, Luke-Dorf claims to be
11 merely a multiple unit dwelling option; but when seeking funds from
12 government agencies, Luke-Dorf emphasizes its treatment services.

13
14 By law, entities running residential facilities must be licensed.

15
16 Luke-Dorf’s own actions, statements, and statements of Luke-Dorf’s
17 government partners show that Luke-Dorf operates an unlicensed
18 residential treatment facility in the heart of Hillsboro. As a direct result of
19 inadequate supervision and monitoring by Luke-Dorf, two young
20 Oregonians were the victims of brutal crimes. But a cursory assessment of
21 the Luke-Dorf operation by an OHA interim manager found that the
22 complex did not need a state license, despite the evidence given elsewhere
23 in the same memo suggesting otherwise.

24 Therefore, the coalition files this complaint and requests that the
25 Oregon Health Authority director initiate a thorough investigation into the
26

1 services actually being provided at the Luke-Dorf Hillsboro complex,
2 daytime and nighttime, and make a careful assessment to decide whether
3 the Legislature actually intended that a facility providing intensive
4 treatment services to mentally ill and/or drug addicted persons be able to
5 locate and operate in the heart of one of Oregon's fastest growing counties
6 with no state licensing, no random inspections, and with no disclosure to
7 the police and public safety officials about the identity of the residents
8 receiving treatment services at the complex.

9 If, after such a thorough investigation, the Director finds that the
10 Hillsboro Luke-Dorf complex need not be licensed, then the residents of
11 Hillsboro, and all other Oregonians, need to be made aware of the serious
12 danger they face: that of finding themselves as close neighbors of
13 unlicensed, unmonitored halfway houses, places where the mentally ill, the
14 addicted, and recently released prisoners can come and go at will, rather
15 than being treated as what they so clearly are: clients placed at a
16 residential treatment facility who require close supervision by a licensed
17 treatment facility operator that is itself closely monitored by the
18 responsible state authority.
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1 **Attachments:**

2 A - *AMH memorandum*, October 10, 2011

3 B - Community Safety Meeting agendas and notes, July 28 and October 21,
4 2010

5 C – Email from Justin Hopkins, Interim Quality and Improvement
6 Manager AHM to Mary Gear, August 17, 2011

7 D – Court Transcript Excerpt, May 25, 2010

8 E – Oregonian, “Hillsboro Man’s Arrest Raises Safety Questions Among
9 Community Members About His Living Facility”, July 29, 2010

10 F - Sentencing hearing transcript excerpt, February 8, 2011

11 G – Emails concerning Good Neighbor Agreement talks, May-October 2011

12 H – Luke-Dorf Job Postings, various dates.

13 I - City of Hillsboro Planning Documents, various dates 2005-2007

14 J – Howard Spanbock, Executive Director Luke-Dorf Inc., Behavioral
15 Health Care, “A Small Agency Takes on a Big Problem,” April 2008

16 K – Oregonian, “Senator Smith Speaks in Hillsboro, Urges Funding for
17 Mental Health,” November 27, 2007

18 L – Luke-Dorf website, [http://www.luke-
20 dorf.org/supportive_housing.php](http://www.luke-
19 dorf.org/supportive_housing.php), accessed on April 15, 2011

21 M – City of Hillsboro Finance Committee Memo, January 12, 2010

22 N- Press Release, Washington County Housing Service Department, “Grant
23 Funding for Homeless Assistance Programs, January 19, 2011

24 O- Washington County Consolidated Plan 2010-2015 p.73

25 P- Introduction to the (Washington County) Community Corrections Plan,
26 2007-2009 Biennium Plan, undated

1 Q - Washington County 10 Year Plan to End Homelessness, July 2008-
2 July 2018.

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