

TENANT SELECTION PLAN
Bayview Apartments
5 Commer Court
San Francisco, CA 94124
Tel: 415-285-7344 / Fax: 415-829-8510 / TTY: 711

Introduction

The objective of this Tenant Selection Plan is to consolidate relevant policies and procedures affecting tenant selection pursuant to applicable federal and state laws and affordable housing and/or subsidy program rules and requirements. The Plan sets out a procedure for processing and selecting applicants, including the establishment of preferences and priorities, occupancy standards, rejection standards, reviews and appeals of rejection decisions, and notice requirements.

The Plan is designed to promote fairness and uniformity in tenant selection. It is also designed to promote efficiencies in the procedure by which applications are processed. One of the principle elements of this plan is that it allows management agents to make a preliminary determination of eligibility based on the applicant's self-certification of income and priority status. Initial acceptance of applicant self-certification generally allows the management agent to focus on other administrative duties rather than investing significant staff time in verifying such information at initial application and once again when the applicant is accepted from the waiting list.

Property

Bayview Apartments is a 146-unit property comprised of 35 one-bedroom, 46 two-bedroom, 45 three-bedroom, and 20 four-bedroom sized apartments. This includes two three-bedroom size employee offline units. There are three affordable programs in place. Project-based Section 8 which covers 113 of the units pursuant to a housing assistance payments (HAP) contract as approved by the Department of Housing Preservation and Development (HUD); the Low Income Housing Tax Credit program as administered by the California Tax Credit Allocation Committee and pursuant to Internal Revenue Code (IRC) §42 which covers 146 units; and the Section 236 Rental Assistance Program which covers 33 units at the site.

Right to Apply

No person may be refused the right to apply for housing unless the development's waiting list is closed and notice of the closed waiting list has been announced in a publication likely to be read by potential applicants in accordance with HUD regulations.

Statement of Non-discrimination

Bayview Apartments is an Equal Housing Opportunity provider and does not discriminate on the basis of disability in the admission or access to, or treatment or employment in, its federally assisted programs and activities. A senior executive has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Housing and Urban Development's regulations implementing Section 504 (24 CFR, part 8 dated June 2, 1988). You may address your request for review or reconsideration to: Fair Housing Officer, Related Management Company, L.P., 410 Tenth Avenue, New York, NY 10001, (212) 319-1200, NY TTY 1-800-662-1220.

It is the policy of Related Management Company, L.P., hereinafter referred to as the Agent, to promote equal opportunity and non-discrimination in compliance with, but not limited to, the federal and state constitutions and legislative enactments addressing discrimination in housing including, The Fair Housing Amendments Act of 1988, Section 504 of the Rehabilitation Act of 1973, and Title VI of the Civil Rights Act of 1964. In furtherance of this policy:

- In carrying out this Tenant Section Plan, the Agent will not discriminate on the basis of race, color, creed, religion, national or ethnic origin, citizenship, ancestry, class, sex, sexual orientation, familial status, disability, military/veteran status, source of income, age, marital status, gender identity, Equal Access Rule or other basis prohibited by local, state or federal law in any aspect of tenant selection or matters related to continued occupancy. The Affirmative Fair Marketing Plan establishes the minimum minority occupancy goal for the development based on the percentage of minorities in the area. The agent will also affirmatively market to persons with disabilities, as specified in its Affirmative Fair Marketing Plan.
- Applicants with Disabilities and Reasonable Accommodations - The Agent will make reasonable accommodations in policies or reasonable modification of common or unit premises for all applicants with disabilities (as defined in the above listed Acts or any subsequent legislation) who require such changes to have equal access to any aspect of the application process or to the development and its programs and services. The Agent will, for example, arrange for sign language interpreters or other communication aids for interviews during the application process.

Selection Criteria

To be considered for selection, applicants must submit a completed application and relevant consent forms. To determine threshold eligibility, the application may be accepted as a self-certifying statement. No third party verification will be required until the screening process for occupancy begins and the household is interviewed. Information needed to determine an applicant's eligibility shall be verified within 120 days of formal acceptance for occupancy. Eligibility does not constitute acceptance and further screening is required to determine an applicant's ability to maintain a successful tenancy.

Eligibility will be determined on the following basis:

1. **Maximum Income – Household annual income must not exceed current income limits for the program to which application is made. When determining family size for establishing income eligibility, all persons living in the unit including foster children and foster adults will be included except for live-in aides.**
2. **Other Eligibility Criteria Pursuant to Program Characteristics – Household characteristics, such as the number of family members and/or their ages, must be appropriate to the size of the unit and pursuant to the subsidy program guidelines. In general, a two person per bedroom + one maximum occupancy standard will be**

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applied. However, additional consideration will be given to households with infants and, if requested, they will be permitted to occupy a smaller unit.

3. Selection Criteria Based on the General Requirements of Tenancy (see Attachment 1 for greater detail) -- This Tenant Selection Plan sets forth the essential requirements of tenancy and the grounds on which tenants will be rejected for failing to meet such requirements. Rejection of an applicant is appropriate where the Agent has a reasonable basis to believe that the tenant cannot meet these essential requirements, which may be summarized as follows:
 - a. to pay rent and other charges under the lease in a timely manner;
 - b. to care for and avoid damaging the unit and common areas, to use facilities and equipment in a reasonable way, and to create no health or safety hazards;
 - c. not to interfere with the rights and enjoyment of others and not to damage the property of others;
 - d. to comply with necessary and reasonable rules and program requirements of the housing provider.

4. Owner has established standards that prohibit admission of:
 - a. Any household containing a member(s) who was evicted in the last three years from federally assisted housing for drug-related criminal activity. The owner may, but is not required to, consider two exceptions to this provision:
 - The evicted household member has successfully completed an approved, supervised drug rehabilitation program; or
 - The circumstances leading to the eviction no longer exist (e.g., the household member no longer resides with the applicant household).
 - b. A household in which any member is currently engaged in illegal use of drugs or for which the owner has reasonable cause to believe that a member's illegal use or pattern of illegal use of a drug may interfere with the health, safety, and right to peaceful enjoyment of the property by other residents;
 - c. Any household member who is subject to a State sex offender lifetime registration requirement; and
 - d. Any household member if there is reasonable cause to believe that member's behavior, from abuse or pattern of abuse of alcohol, may interfere with the health, safety, and right to peaceful enjoyment by other residents. The screening standards must be based on behavior, not the condition of alcoholism or alcohol abuse.

5. An applicant with a history of criminal conviction(s) will always have his/her conviction history individually assessed and will not be denied housing solely as a result of having a conviction(s) on his/her record.
 - a. The individualized assessment will take into account: the time which has elapsed since the criminal conviction(s); the age of the person at the time of

- the conviction(s); the seriousness of the conviction(s); and any information produced by the applicant, or produced on his or her behalf, in regard to rehabilitation and good conduct, including but not limited to, evidence of completion of treatment, rehabilitative programming, history of employment and tenancy, volunteer or community activity, and letters of reference from employers, landlords, community members or others who could speak to the person's conduct since the conviction. Note: if, after conducting the assessment, the housing company determines that the household is not eligible, it should be able to articulate its reasoning with specificity.
- b. This plan provides for the consideration of mitigating factors that rebut the presumption that an applicant will be unable to meet the requirements of tenancy. Mitigating factors may include a showing of rehabilitation or rehabilitating efforts. Mitigating factors must be balanced against the potentially disqualifying behavior or circumstances. In considering both the disqualifying behavior and mitigating factors, the Agent will determine if there is a reasonable risk that the applicant will be unable to meet the essential requirements of tenancy. Among the factors that should be considered are:
- the severity of the potentially disqualifying conduct;
 - the amount of time that has elapsed since the occurrence of such conduct;
 - the degree of danger, if any, to the health, safety and security of others or to the security of the property of others or to the physical conditions of the housing development and its common areas if the conduct recurred;
 - the disruption, inconvenience, or financial impact that recurrence would cause the housing provider; and
 - the likelihood that the applicant's behavior in the future will be substantially improved.

In general, the greater degree of danger, if any, to the health, safety and security of others or to the security of property of others or the physical condition of the housing, the greater must be the strength of showing that a recurrence of behavior (which led to an initial determination that the applicant would not be able to meet the essential requirements of tenancy) will not occur in the future.

Eligibility Criteria

The Agent will consider housing applicants for residency who at the time of admission, meet all of the following conditions, as outlined in HUD regulations and any applicable federal/state guidelines, and who have submitted an application for occupancy. The following criteria shall be utilized to determine an applicant's eligibility:

- eligibility based on income limit restrictions;
- compliance with unit size standards;
- eligibility based on non-citizen restrictions (Section 214 of the Housing &

- Community Development Act of 1980, as amended);
- disclosure and verification of a Social Security Number for all applicants and tenants except those individuals who do not contend eligible immigration status or tenants who are age 62 or older as of January 31, 2010, and whose initial eligibility began prior to January 31, 2010.
 - eligibility based on the student status of household members

Income Limits:

To determine eligibility based on income limits, the Agent must compare the household's gross annual income to the applicable income limit. If the household's income exceeds the income limit, the household may not qualify for assistance.

- a. Section 236
 - Existing residents pay the approved Section 236 rents or the approved excess rent as calculated by OneSite.
 - 2020 regulatory change allows for new Section 236 residents to be charged up to 30% of 80% of the area median income not to exceed the max allowable LIHTC 60% TC level.
 - Although Section 236 allows for 30% of 80% rents, TCAC regulations are more restrictive so the max allowable 236 rent will be the net 60% tax credit rent.
- b. Tax Credit Income Limits
 - 21% of the units at 50% of the area median income limit – see applicable limits posted in the rental office.
 - 79% of the units at 60% of the area median income limit– see applicable limits posted in the rental office.
 - This includes two three-bedroom employee offline units.
- c. Section 8 Income Limits – Pre-Universe (10/1/81)
 - Very-Low Income – see applicable limits posted in the rental office.
 - *Extremely-Low Income – see applicable limits posted in the rental office.

*Extremely low-income limit = Families whose incomes do not exceed the higher of the federal poverty level OR 30% of Area Median Income.

Unit Size Standards:

To determine compliance with unit size standards, the Agent will follow consistent occupancy guidelines that take into account the size and number of bedrooms needed based on the number of people in the household. Occupancy standards serve to prevent over- or under-utilization of units that can result in an inefficient use of housing

assistance. Occupancy standards also ensure that tenants are treated fairly and consistently and receive adequate housing space. In general, a two person per bedroom + one maximum occupancy standard will be applied. However, additional consideration will be given to households with an infant. If an applicant household includes an unborn child or child under the age of 2 years old, then this household may be assigned a smaller unit or placed on this unit's waiting list if it is requested by the applicant household.

Non-Citizen Restrictions:

Citizen and non-citizen applicants are required to submit evidence of citizenship or eligible immigration status at the time of application. To determine eligibility based non-citizen status, the Agent will process the following documents for all family members including foster children and foster adults: family summary sheets, declaration of citizen status, and verification consent forms, as required.

- For a family member who declares U.S. citizenship, no proof or verification is required.
- For a family member who chooses not to claim eligible citizenship status, no proof or verification is required.
- For a family member who claims eligible non-citizen status, an original DHS document (a list of acceptable forms can be found in the 4350.3, Figure 3-4) and verification consent form is to be obtained. This member's eligibility status must be verified through the Systematic Alien Verification for Entitlements (SAVE) web-based program, DHS' automated system. If eligibility status is not verified, the Agent must notify the applicant household and discuss options available to the household and their right to appeal the decision to the DHS and/or hold an informal meeting with the owner.
- Appeals to DHS should be addressed to:

DHS/USCIS
630 Sansome Street
San Francisco, CA 94111
Attention: Immigration Status Verifier

- For a family member 62 years of age or older who claims eligible non-citizen status, a signed declaration of eligible non-citizen status and proof of age is to be obtained. Non-citizen status is not required to be verified by the DHS.
- A family with one or more ineligible family members and one or more eligible family members is considered a mixed family may receive prorated assistance.

Social Security Number Disclosure:

To determine eligibility based on Social Security numbers, the head of the applicant

household/spouse/co-head must disclose SSNs for all household members including live-in aides, foster children and foster adults except those individuals who do not contend eligible immigration status or tenants who are age 62 or older as of January 31, 2010, and whose initial eligibility began prior to January 31, 2010.

When determining the eligibility of an individual who meets the exception requirements for SSN disclosure and verification, documentation must be obtained from the owner of the property where the initial determination of eligibility was determined prior to January 31, 2010, that verifies the applicant's exemption status. This documentation must be retained in the tenant file. An O/A must not accept a certification from the applicant stating they qualify for the exemption.

If no SSN has been assigned to a particular applicant household member, the household will not be eligible for tenancy. An applicant who has not disclosed and/or provided verification of SSNs for all non-exempt household members has 90 days from the date they are first offered an available unit to disclose and/or verify the SSNs. During this 90-day period, the applicant may, at its discretion, retain its place on the waiting list. After 90 days, if the applicant is unable to disclose and/or verify the SSNs of all non-exempt household members, the applicant should be determined ineligible and removed from the waiting list.

When a tenant requests to add a household member who is age six or older, the documentation of the SSN for the new household member, must be provided to the O/A at the time of the request or at the time the recertification that includes the new household member is processed. The O/A must not add the new household member until such time as the documentation is provided. When adding a household member who is a child under the age of six with a SSN, the child's SSN must be disclosed and verification provided at the time of processing the recertification of family composition that includes the new household member. If the child does not have a SSN, the O/A must give the household 90 days in which to provide documentation of a SSN for the child.

An additional 90-day period must be granted by the O/A if the failure to provide documentation of a SSN is due to circumstances that are outside the control of the tenant. Examples include but are not limited to: delayed processing of the SSN application by the SSA, natural disaster, fire, death in family, etc. During this time period, the child is to be included as part of the household and will receive all of the benefits of the program in which the tenant is involved, including the dependent deduction. Subject to the exemptions allowed, current households may lose its tenancy if one member of the household does not comply with the SSN disclosure requirements

When adding a household member who is a child under the age of six (6) or older, or is under the age of six and has a SNN, the tenant must disclose and provide verification of the individual to be added to the household. This SSN must be provided to the owner at the time of the request, or at the time the recertification that included the new household

member is processed.

When Under the Age of Six without an assigned SSN, the tenant must disclose and provide verification of the new household member's SSN within 90 calendar days of the child being added to the household. The owner must grant an extension of one additional 90-day period, if the owner, in its discretion, determines that the tenant's failure to comply is due to circumstances that could not have been foreseen and were outside the control of the tenant, e.g., delay in processing by SSA, natural disaster, fire, death in family, etc). In HUD Assisted communities, during the period that the owner is awaiting disclosure and verification of the SSN, the child is included as part of the household and shall be entitled to all of the benefits of being a household member, including the dependent deduction. A TRACS ID will be assigned to the child until the time the SSN is provided. At the time of the disclosure of the SSN, an interim recertification must be processed changing the child's TRACS ID to the child's verified SSN. If, upon expiration of the provided time period, the tenant fails to disclose and provide verification of the SSN, the tenant and the tenant's household are subject to termination of tenancy. The owner shall follow the guidance in Paragraph 8-13.A.6 to terminate the household's tenancy.

Student Status Restrictions - Section 8:

A student (full or part-time) must meet all of the following criteria in order to be eligible for HUD assistance programs:

- a. Be of legal contract age under state law;
- b. Have established a household separate from parents or legal guardians for at least one year prior to application for occupancy, or
- c. Establish Independence from Parents: Owners must use, and the student must meet, one or more of the following criteria:
 - 1) The individual is 24 years of age or older by December 31 of the award year;
 - 2) The individual is an orphan, in foster care, or a ward of the court at any time when the individual was 13 years of age or older;
 - 3) The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's State of legal residence;
 - 4) The individual is a veteran of the Armed Forces of the United States or is currently serving on active duty in the Armed Forces for other than training purposes;
 - 5) The individual is a graduate or professional student;
 - 6) The individual is a married individual;
 - 7) The individual has legal dependents other than a spouse;
 - 8) The individual has been verified during the school year in which the

application is submitted as either an unaccompanied youth who is a homeless child or youth or a unaccompanied, at risk of homelessness, and self-supporting by:

- A local educational agency homeless liaison;
- The director of a program funded under the Runaway and Homeless Youth Act or a designee of the director;
- The director of a program funded under subtitle B of title IV of the McKinney – Vento Homeless Assistance Act (relating to emergency shelter grants) or the designee of the director;
- A financial aid coordinator.

9) The individual is a student whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstance.

- d. Not be claimed as a dependent by parents or legal guardians pursuant to IRS regulations; and
- e. Obtain a certification of the amount of financial assistance that will be provided by parents, signed by the individual providing the support. This certification is required even if no assistance will be provided. This certification is not required for vulnerable youth populations, including individuals who are orphans, in foster care, wards of the court, emancipated minors, unaccompanied homeless youth, and youth at risk of becoming homeless.

In addition, an individual cannot reside in a Section 8 unit if that individual:

- a) Is enrolled as either a part-time or full-time student at an institution of higher education for the purpose of obtaining a degree, certificate, or other program leading to a recognized educational credential; and
- b) Is under the age of 24; and
- c) Is not married; or
- d) Is not a veteran of the United States Military; or
- e) Does not have a dependent child; or
- f) Is not a person with disabilities, as such term is defined in 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving Section 8 assistance as of November 30, 2005; or
- g) Is not living with his or her parents who are receiving Section 8 assistance; and
- h) Is not individually eligible to receive Section 8 assistance or has parents (individually or jointly) who are not income eligible to receive Section 8 assistance.

If a student becomes ineligible after move-in, their assistance may be terminated in accordance with program guidance. The household's rent may be increased to the market rate rent for the unit.

A student's eligibility requirements for Section 8 assistance will be determined at move-in, annual recertification, initial certification (when an in-place tenant begins receiving Section 8) and due to household changes in enrollment – interim certification.

Financial assistance a student receives (1) under the Higher Education Act of 1965, (2) from private sources, or (3) from an institution of higher education that is in excess of amounts received for tuition is included in annual income, except if the student is over the age of 23 with dependent children or if the student is living with his or her parents who are receiving Section 8 assistance. *Note: HUD has interpreted the term "financial assistance" as used in Section 327(b) to not include loan proceeds for the purpose of determining income. However, all income in excess of tuition fees is to be included as income.*

Student Status Restrictions – LIHTC; A household that consists entirely of full-time students as defined in the tax credit code is not eligible. The exclusions to this rule are a head of household who meets one of the following criteria:

- Married and files a joint tax return with spouse
- Enrolled in a job-training program receiving assistance under the Job Partnership Training Act
- A Title IV/TANF recipient
- A single parent living with their minor child(ren), and applicant and child(ren) are not dependents on another's tax return
- Was previously in foster care

Violence Against Women Act (VAWA)

The Violence Against Women Act (VAWA) protections apply to households applying for or receiving rental assistance under the project-based Section 8 (project and tenant based), 202, 811, 236, 221(d)(3), HOPWA, HOME programs, and public housing as well as Homeless Programs Under Title IV of the McKinney-Vento Homeless Assistance Act. The following non-HUD programs are also subject to VAWA 2013 but do not fall under HUD's Implementation Rules, unless instructed by your governing / monitoring agency: Rural Housing and LIHTC. The law protects women or men who are victims of domestic violence, dating violence, stalking or sexual assault, as well as their affiliated persons from being evicted or being denied housing assistance if an incident of violence is reported or if the victim suffers economic and criminal circumstances as a result of the abuse.

The law also creates emergency transfer options for victims and their affiliates, allowing survivors to transfer to a different unit if they are in fear for their life or safety, and provides for bifurcation of the lease to allow for an abuser to be removed and the

victim and other household members to remain in the unit even if for a period of time. In addition:

- HUD requires that the VAWA Notice of Occupancy Rights Under the Violence Against Women Act (Form HUD-5380) and Certification of Domestic Violence, dating Violence, Sex Assault or Stalking, And Alternate Documentation (Form HUD-5382) be provided to (1) all applicants at move-in (2) applicants at the time of denial of housing, (3) to each household in the event that eviction or termination of assistance actions are commenced against the household no matter the reason – i.e. arrears.
- The HUD approved lease addendum 91067 must be signed by all adult household members at lease signing.
- An applicant's status as a victim of domestic violence is not a basis for denial of rental assistance or for denial of admission if the applicant otherwise qualifies for assistance and admission. If an applicant is living in a shelter for victims of domestic violence and crimes protected under VAWA, we may accept verification of this in lieu of additional landlord verification.
- Being a victim of a VAWA crime is not a reason to change the eligibility or applicant screening requirements or to waive the requirements of the HUD Model Lease or other lease unless such requirements interfere with the protections provided under VAWA.
- VAWA 2013 does not limit an owner's agent's right to terminate assistance/tenancy for any violation that is not related to a VAWA crime. However, the owner/agent must not subject the victim or a person affiliated with the victim to a more demanding standard than other residents when determining whether to terminate assistance/tenancy.
- VAWA does not limit an owner/agent's right to terminate assistance/tenancy if the owner/agent can demonstrate an actual and imminent threat would be present if that resident or lawful occupant is not terminated. An actual and imminent threat is a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. The threat would be to other tenants, employees of the property, or to vendors providing services at the site.
- An incident or incidents of actual or threatened domestic violence will not be taken as serious or repeated violations of the lease or other "good cause" for terminating the assistance, tenancy, or occupancy rights of a victim of abuse.
- Assistance may be terminated or a lease bifurcated (divided) in order to remove an offending household member from the home. Whether or not the individual is a signatory to the lease and lawful tenant, if he/she engages in a criminal act of physical violence against household/family members or others, he/she stands to be evicted, removed, or have his/her occupancy rights terminated. This action is taken while allowing the victim, who is a tenant or a lawful occupant, to

remain. Eviction or termination action against individuals must be in accordance with procedures prescribed by federal, state, and local law.

- In the event that one household member is removed from the unit because he/she engaged in acts of domestic violence, an interim recertification must be processed by staff in a timely manner and in accordance with HUD regulations to reflect the change in household composition. Note: at sites that do not have interim recertifications (i.e. straight tax credit sites), a bifurcated lease addendum must be provided.
- In regard to VAWA lease bifurcation: it does not matter if the household member is a signatory on the lease. Bifurcation must be carried out in accordance with Federal, State or local laws. The remaining members must be given 90 calendar days from the date of bifurcation to: establish eligibility under the covered program; or establish eligibility under another covered program; or find alternative housing. The tenant may be given up to an additional 60 days if allowed by the program.
- VAWA does not require an owner/agent to request that an individual seeking VAWA protections submit documentation of the status of the individual as a victim of domestic violence, dating violence, sexual assault or stalking, however, if such a request is made provide the applicant or resident with a copy of the VAWA Certification (Form HUD-5382) to fill out and process accordingly. Further, at least 14 days must be provided from the date of the request for completion by the applicant/resident.
- Owners/agents may accept the following in lieu of the certification form: a document signed by an employee, agent or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault or stalking or the effects of abuse; a document signed by the applicant or resident and that specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection; a record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or, at the discretion of the housing provider, a statement or other evidence provided by the applicant or resident.
- Residents or applicants who are victims of VAWA crimes may request a VAWA accommodation or an emergency transfer and should be provided with HUD-5383 (VET Request) form to fill out.
- Staff must retain all documentation relating to an individual's domestic violence, dating violence, sexual assault, or stalking in a **separate file** that is kept in a secure location. This documentation must not be incorporated into the standard applicant or resident file for the household.
- Any information submitted to an Agent regarding domestic violence, dating violence, sexual assault or stalking must be maintained in confidence, and employees must not have access to the information unless explicitly authorized.

Staff must retain all documentation relating to such information in a separate file that is kept in a secure location. This documentation must not be incorporated into the standard applicant or resident file for the household or stored in any shared database unless it is requested or consented to in writing by the victim in a time-limited release; required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program, or otherwise required by applicable law.

- When communicating with an applicant or tenant who has requested VAWA protections, Agents must take precautions to avoid inadvertent disclosure of confidential information. For example, unless given permission from the victim to do so, the Agent must not leave messages that contain confidential information or refer to VAWA, the VAWA protections, or the incident of domestic violence, dating violence, sexual assault, or stalking on the victim's voicemail system or with other individuals, including members of the victim's household. In addition, any communications with a third party must be done consistent with the VAWA rule's confidentiality requirements.

Screening Procedures

1. Screening Process

To obtain information about an applicant's ability to meet the essential requirements of tenancy, the Agent will attempt to secure background information from the following sources for household members 18 years or older, including members added at a later time and/or Live-in Aides:

- references from landlords in the last two years or from the last two successive tenancies, whichever is more inclusive;
- record of prior criminal history;
- references from a credit bureau;
- verification of income either from a present employer, appropriate agency, financial institution or other appropriate party.
- verification of a disability from an applicable professional when the applicant requests an accessible unit, modification to a unit, eligibility for a preference based on disability status, or a reasonable accommodation. Inquiries concerning a person's disability or disabilities in this regard will be limited to verification of the disability and the need for an accommodation or specific design features of a unit, or to verify the qualification for a program. The Agent will not make inquiries regarding an applicant's ability to comply with the terms of the lease, including caring for the unit, unless past tenancy history or other evidence suggests that applicant is unable to satisfy some term of the lease.

- For HUD assisted communities, Enterprise Income Verification (EIV) Existing Tenant Search must be run at the time of application processing for all household members including minors, live-in aides, foster children and foster adults to determine if applicants are currently residing at another Multifamily Housing or Public and Indian Housing (PIH) location. EIV will query both the TRACS and IMS (PIC) databases. The report gives the owners the ability to coordinate move-out and move-in dates with the owners of the property at the other location. If the applicant is residing at another location:
 - a. Site staff should discuss this specific situation with the applicant, giving the applicant the opportunity to explain any circumstances relative to his/her being assisted at another location. This may be a case where the applicant wants to move from their existing location.
 - b. Site staff will follow-up with the respective PHA or O/A to confirm the individual's program participation status before admission as well as verifying that notice has been given to coincide with applicants proposed move in date.

2. Mitigating Circumstances

- a. If an applicant claims that past tenancy-related problems were the result of a disability and that some condition has changed making such behavior unlikely to recur, the Agent will consider evidence supporting such claims. All applicants are responsible for providing verification for such claims. In instances where the applicant claims that some services or treatment will be available to enable the applicant to correct the problem behavior, the development will require verification that such services are available and that the applicant is likely to continue to use such services or treatment.

Mitigating circumstances will be verified and the individual performing the verification must corroborate the reason given by the applicant for unacceptable tenancy-related behavior and indicate that the prospect for lease compliance in the future is good because the reason for the unacceptable behavior is either no longer in effect or otherwise controlled.

- b. Where an applicant claims that prior unacceptable tenancy-related behavior resulted from alcohol abuse or use of illegal drugs, acceptable verification of mitigating circumstances would have to establish that:
 - (As applicable) There is no current illegal use, within the last year, of controlled substances. If such use is documented, applicant must present evidence that such use has stopped and is unlikely to recur.
 - (As applicable) There is no current abuse of alcohol and abuse is unlikely to recur.
 - During the period for which the applicant has claimed no current use, the applicant's behavior in the previously unacceptable tenancy-related area

must have been acceptable.

In any case of confirmed, continued, unacceptable tenancy-related behavior, despite the cessation of drugs or alcohol use, an applicant may be rejected.

- c. An Agent may consider an applicant's credit history, primarily in cases where rental history is not available. Where bad credit is the basis for rejection, mitigating circumstances may include: (i) a reliable third party agency who would take written responsibility for payment, or (ii) evidence that such poor credit was the result of a disability that is now under control, or (iii) evidence that credit problems were the result of other circumstances that no longer exist and there is reason to believe that applicant will now pay the rent promptly and in full. All relevant mitigating circumstances and factor will be clearly documented in the applicant's file.

An applicant's ability and willingness to pay rent must be demonstrated through an identifiable source of sufficient income to pay rent and prior rental history. The lack of credit history, as opposed to poor credit history, is not sufficient justification to reject an applicant.

The management agent shall have the right to request information reasonably needed to verify the mitigating circumstances, even if such information is of a confidential nature (e.g. doctors' reports). If the applicant refuses to provide or give access to such further information the management agent may choose not to give further consideration to the mitigating circumstance.

3. Prohibited Screening Criteria

The Agent may not screen applicants for eligibility on the basis of the following:

- Physical Examinations. The Agent will not require physical examinations or medical testing as a condition of admission.
- Meals and Other Services. The Agent will not require tenants to participate in a meals program.
- Donations or Contributions. The Agent will not require a donation, contribution or membership fee as a condition of admission, except that cooperative housing projects may charge a membership fee. Owners may not require any payments not provided in the lease.
- Disability Status. Except as discussed earlier, it is unlawful to make an inquiry to determine if an applicant for a dwelling unit, a person intending to reside in that dwelling unit after it is rented or made available, or any persons associated with the applicant, has a disability, or to make inquiry as to the nature or severity of an identified disability.

Application to Housing

Application forms may be distributed and accepted online/electronically, in person, or by mail. The application form asks all the necessary information to determine initial program eligibility,

- provides the opportunity to state the need or desire for an accessible unit,
- provides notice of the right to a reasonable accommodation of a disability,
- includes the Equal Opportunity logo and slogan, as well as the Accessibility logo, if required,
- includes the non-discrimination statement,
- provides the opportunity to indicate eligibility for a preference

Failure to respond to the Agent's reasonable requests for documentation or information to process the application may result in withdrawal of an application from further processing. The Agent may make exceptions to the procedures described herein to take into account circumstances beyond the applicant's control, including medical problems or extreme weather conditions.

The Agent will make reasonable accommodations in policies for all applicants with disabilities (as defined in the above listed Acts or any subsequent legislation) who require such changes to have equal access to any aspect of the application process. The Agent will offer aid to the applicant in completing the application, explaining the tenant selection process, and explaining the verification process with respect to preferences.

Every application must be completed and signed by the head of the household. Household members 18 years or older, including members added at a later time and/or Live-in Aide, must sign a release to conduct criminal, credit, and landlord history references, provided that credit information for Live-in Aide is not necessary because their income is not included in the household income calculation. Live-in Aides are defined as a person who resides with one or more elderly persons, near-elderly persons, or persons with disabilities, and who (a) is determined to be essential to the care and well-being of the persons (b) is not obligated for support of the household member; (c) would not be residing in the unit except to provide such necessary supportive services to the household member. All members of the household must be listed on the application form. Adult applicant/resident household members who are at least 18 years of age and each family head, spouse or co-head, regardless of age, must sign and date the HUD-9887 Notice and Consent for the Release of Information to HUD and PHA and the 9887A Applicant's/Tenant's Consent to the Release of Information prior to being accepted and every year thereafter.

It is the policy of the Agent to guard the privacy of individuals in accordance with the Federal Privacy Act of 1974 and applicable state laws, and to ensure the protection of

records maintained by the property concerning the applicants or tenants.

The Agent shall not disclose any personal information contained in its records to any persons or agencies other than authorized government agency unless the individual about whom information is requested has given written consent to such disclosure, or unless disclosure is otherwise in accordance with provisions in the state or federal privacy acts.

This privacy policy in no way limits the property's ability to collect such information as it may need to determine eligibility, compute rent, or determine an applicant's suitability for tenancy or to gather information to process reasonable accommodations requests under Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act.

The above policies in no way limit the right or duty of the Agent to report suspected abuse, neglect or other protective service or emergency reports. Additionally, such policies do not forbid management from sharing information in the public domain with relevant service or government agencies.

Rejection of Application

Applicants not meeting all program or project eligibility requirements and/or not meeting the screening criteria will be rejected. Written rejection notices will be mailed to applicants and will state the reason(s) for rejection and will notify the applicant that he/she has the right to respond to the owner/agent in writing or to request a meeting within 14 days to appeal the rejection. Additionally, the notice shall state that the applicant has the right to request a reasonable accommodation if the applicant believes that, with such an accommodation, the applicant would be eligible for admission and that the applicant was rejected for a reason arising from the applicant's disability.

Rejection Appeal Meetings

Any meeting with the applicant to discuss the applicant's rejection will be conducted by an employee of the Agent who was not involved in the initial decision to deny admission. During these meetings, applicants will have the opportunity to provide additional supplemental information or documents relating to the reason(s) for rejection.

The Agent will send a written response to each applicant advising such applicant of the status of the application within 5 business days of the appeal meeting. Alternate formats for responding to an applicant with a disability will be provided upon applicant's request.

Application Processing

Applications will be accepted only if they are completed on online/electronic or original Related Management forms and bear the original electronic or handwritten signature of

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the head of household. Applicants may submit applications in person at the site's management office, by mailing them to the site's management office, or in accordance with specific requirements of the site's re-marketing plan that will be stated in the outreach.

Completed applications will be date and time stamped, are recorded in the site's electronic waitlist, and assigned an application number. Application numbers are assigned chronologically.

In general, applications will be processed in accordance with the following steps:

- Review for completeness - Applications will first be reviewed for completeness. Incomplete applications will be returned to the applicant and will not be evaluated until the application is returned to the Agent with all required information.
- Preliminary determination of program ineligibility - Completed applications will be reviewed for income eligibility and compliance with any categorical eligibility requirements such as age or disability, if applicable. Applications determined ineligible, pursuant to program guidelines, will be rejected in accordance with procedures outlined above.
- Preliminary determination of program eligibility - When there are more applicants on the waiting list than units currently available, the Agent will make a preliminary determination of eligibility, based on the applicant's self-certified statement as to his or her income, assets, age, disability status, and preference or priority status. Applicant will be notified of the status of his/her application.
- Waiting list placement - Once a fully completed application is determined to meet income eligibility requirements and the household composition is determined appropriate for a unit at the development, the applicant will be placed on the appropriate waiting list(s). Applicants eligible for accessible units may choose to be on lists for accessible and standard units. Assignment to a position on the waiting list will be based on this preliminary determination and will be formally verified as the applicant's name advances on the waiting list. The applicant will be placed on the waiting list, by assigned lottery number or date of receipt, within the correct preference category, where applicable.
- Formal verification – If, subsequent to the preliminary determination of eligibility, the Agent determines that the formal verification of income, assets, or claimed priority status differs from the applicant's self-certification, the applicant may be:
 - reassigned to another waiting list, i.e., smaller or larger bedroom size;
 - reassigned to a different preference status; or

- determined to be ineligible.

Population Served

This site provides family housing.

Statutory Preference

An applicant household who has been displaced due to governmental action or a presidentially declared disaster, and who meets the admissions and program eligibility requirements will be provided priority housing over current applicants on the active applicant waiting list.

The applicant must provide documentation of government displacement or displacement as a result of a presidentially declared disaster. Acceptable documentation includes copies of local government condemnation or displacement notices or government notices indicating that an applicant is eligible for disaster relief benefits. If these documents are not available, a letter (on appropriate letterhead) from a government organization confirming that the applicant is being displaced by government action or a presidentially declared disaster is acceptable. If written documents cannot be obtained, management will verify the displacement by phone with the local government office, or a disaster relief office, and make a notation in the file as to the date of the oral verification.

Local Preferences

This site does not apply any local preferences.

Waiting Lists

The Agent will administer its waiting lists in accordance with the following policies.

- Waiting lists will be maintained as an electronic file. A printed copy of the waiting lists will be printed monthly and maintained as a historical record. The time and date of the printout will appear on the report file.
- Waiting lists will be organized by type of unit. "Type of unit" may be defined in several ways, including:
 - the number of bedrooms
 - the physical characteristics of the unit, such as accessible features.
 - the type of subsidy attached to the unit, such as project-based subsidy.
- Each applicant must be placed on the appropriate waiting list(s) chronologically

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according to the date of the completed application or assigned lottery number within the applicable preference categories. Non-preference applicants shall be placed on the waiting list per the date of the completed application.

- If an applicant is eligible for tenancy, but no appropriately sized unit is available, the Agent will place the family on a waiting list for the development. Households that are eligible for more than one size of unit (by bedroom size) may choose to be placed on multiple waiting lists as appropriate and The Agent will respect the bedroom size option chosen by the applicant unless such choice is contrary to the development's occupancy standard. Persons using a wheelchair or requiring similar accommodations may apply for a standard unit, as well as an accessible unit, at their discretion.
- The Agent's records will indicate the date the applicant is placed on the waiting list. All applicant file records, including the application, must be retained for a period of three (3) years.
- Agent will contact applicants on an annual basis (every 12 months) with a notice included for the applicant to return to confirm continued interest in the property. Response by the applicant may be by electronic form (email), US mail, or drop off at the property's management office. Failure to respond to the Agent's notice to contact the project will result in the applicant's removed from the waiting list.
- Waiting lists will be closed to ensure that the wait for a unit does not become excessive. When the decision is made to close the waiting list, the closing of the waiting list will be advertised according to the Affirmative Fair Housing Marketing Plan (AFHMP).
- When an applicant pool is no longer adequate due to the closure of the waiting list, the list shall be re-opened. The opening of the waiting list will be advertised according to the Affirmative Fair Housing Marketing Plan (AFHMP).

Calling Applicants from Waiting List

Agent shall notify applicants of potential housing opportunities at the property as applicant's name nears the top of the waiting list.

- Agent will attempt to telephonically contact applicant about potential housing opportunity.
- If unable to successfully contact applicant by phone, Agent shall mail applicant a written letter confirming the time and date to visit the property to begin the eligibility and income certification process. Letter will instruct Applicant to confirm availability or reschedule appointment at a mutually convenient time.

- Should applicant not attend appointment or respond to letter, a second letter will be mailed to applicant. This letter shall provide the applicant with five business to respond before their name will be removed from the waiting list.'
- If applicant does not respond within the five business days a written notification that they are being taken off the waiting list will be mailed to the applicant.

Should several applicants affirmatively qualify for the available housing opportunity, the applicant with the highest waiting list ranking will be offered the available apartment. Other applicants will maintain their current waiting list position and be considered as additional units become available.

Applicants' Right to Request a One Time Pass

Applicants unable to move to the property at the time an appropriately size unit becomes available will be permitted to refuse processing for an available unit once, for any reason. They will remain at the top of the waiting list and be offered a second unit, not less than thirty days after the first unit was available. If a second offered available unit is refused, the application will be removed from the waiting list. Special consideration for applicants requiring additional extension as a part of a reasonable accommodation process may be granted.

- If an applicant is removed from the waitlist because of failure to be processed for (second) available unit, the applicant may reapply if the waitlist is open, but the request will be placed on the waiting list in chronological order based on the date of the new application.

Section 8 Program Income-Targeting Requirements

Management will make at least forty percent (40%) of the Section-8 assisted units that become available in the property's fiscal year, available to households whose income does not exceed the extremely-low income limit (ELI). This will be accomplished by the following method:

- For each vacancy, management will examine the percentage of ELI admissions for the year to date by pulling the Income Targeting Report out of the property management software.
- If it appears that the number of ELI households admitted may fall below 40%, management will pass over any non-ELI applicants at the top of the waiting list and select and process the highest ELI applicants. When management determines that

the number of ELI households admitted is and will again be above 40%, management will return to selecting applicants based on the next applicant at the top of waiting list.

- Site staff will note on the waiting list the reason for the pass over on the applicant on the top of the waiting list reason was due to the ELI Income Targeting Requirements.

Transfer Procedure for Existing Residents

In filling vacancies, the Owner shall process current residents from the internal transfer list on an alternating basis with applicants on the external waiting list. The internal transfer list will consist of transfers for reasons listed below.

1. Permitted transfers - Transfers will be permitted at any time during the tenancy under the following circumstances:
 - a. As reasonable accommodations to qualified individuals with disabilities
 - b. Pursuant to an emergency request for transfer under VAWA.
 - c. As required for the underutilization or overutilization pursuant to HUD regulations
2. How to request a transfer – with the exception of reasonable accommodations, which may be made orally or in writing, Residents who would like to request a transfer must make their request to the management office in writing, stating the reason for the request. If the request is based on a reasonable accommodation for a disability, and the disability/need are not obvious, the resident may need to complete paperwork that will allow the management office to confirm the need for the accommodation with a third party who can provide a professional validation of the need.
3. Transfers will be approved per the following:
 - a. If the resident meets the definition of “Tenant in Good Standing” as defined below.
 - No current or pending legal actions, including actions for non-payment of rent; material non-compliance with the terms of the lease; holdover actions, etc.
 - No uncured lease violations
 - No outstanding balances for other charges, including late fees, damages, legal fees, etc.
 - No material damages or alterations, etc., to the current unit as confirmed by management’s inspection of same. In addition, if any charges are billed to the tenant for other damages, excessive cleaning, repairs, etc. resulting from this inspection, those charges must be paid before the transfer will be permitted.
 - b. If the resident meets all compliance requirements for the transfer.

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- c. If the resident meets all obligations per the lease on his/her current unit, including satisfactory care of the unit as confirmed by a management inspection of the unit, and including payment of any and all damage charges that might result from the inspection for repairs/maintenance, etc., beyond normal wear and tear.
 - d. Tenant in Good Standing does not apply to transfers based on a medical need or for an accessible unit.
 4. Transfer Fees - There are no additional fees for transfers other than the normal move-out expenses. Transfers pursuant to a reasonable accommodation due to disability will be at the Owner's expense.
 5. Program Compliance and Tenant Certification Requirements
 - a. If the approved transfer is within the same building/bin number as the resident's current apartment, the resident remains qualified under the Tax Credit program and will not be required to complete an Initial Tenant Income Certification for the new unit; however, a new lease for the new unit will be required to be executed. Additionally, the Owner's minimum income limit must be met to assure the affordability of the rent on the new unit. This requirement is waived for those residents with housing assistance vouchers.
 - b. If the Owner elected "Yes" on line 8b on the 8609, an existing household can transfer to a different rent-restricted unit in a different building in the Phase as long as the current income of the tenants does not exceed 140%. All application, certification, and verification procedures for the transferring resident(s), including the income and asset verifications transfer with the household, and the units then swap status. However, a new lease for the new unit will be required to be executed and the Owner's minimum income limit must be met to assure the affordability of the rent on the new unit. This requirement is waived for those residents with housing assistance vouchers.
 - c. If the Owner elected "No" on line 8b on the 8609, then Regional/OpRisk approval will be required to transfer into a different building/bin number than the resident's current apartment, and the resident must first participate in the certification process to confirm eligibility for the program. All program eligibility factors must be met before the transfer can be approved, including income eligibility and full-time-student eligibility.
 - d. Additionally, the Owner's minimum income requirement must be met to ensure the affordability of the rent for the new unit. This requirement is waived for those residents with housing assistance vouchers. If the household does qualify for the new unit, a new Initial Tenant Income Certification must be executed along with the new lease.
 - e. If the transfer is validated and approved as a reasonable accommodation to a qualified individual with a disability, TCAC has waived the income requirement for transferring to a building with a different bin number. Please

- ensure the site follows the reasonable accommodation transfer policy and has the correct documentation in the file to support the transfer. There are no additional fees for transfers other than the normal move-out expenses.
6. Resident's right to refuse an offered unit
 - a. Residents requesting transfer will be permitted to refuse an offered unit once, for any reason. If a second offered unit is refused, the transfer request will be deactivated and the resident will be removed from the waiting list unless the resident requests to remain on the waiting list and presents a reason for refusal that can be validated as uncontrollable by the resident, such as hospitalization, family emergency, etc.
 - b. If a resident is removed from the transfer list because of failure to accept a (second) offered unit, the resident may reapply for a transfer, but the request will be placed on the waiting list in chronological order based on the date of the new request.
 7. Site staff will typically become aware of the need for transfer:
 - a. by remaining aware of the household size/composition of the residents (which should be regularly reviewed/confirmed at the time of each annual or interim recertification)
 - b. by receiving an actual request from the resident him/herself
 8. A transfer list should be maintained in the appropriate order based on the following priority guidelines:
 - a. Those households requiring/requesting a transfer because of a disability under the Section 504/Reasonable Accommodation program or due to an emergency transfer under VAWA will take priority over other transfers based on household size/composition. The Owner will pay for a Tenant's move based on a reasonable accommodation transfer for medical reasons or disability.
 - b. Those households requiring transfer because of a change in household size and/or composition will take priority over households requesting a transfer AFTER having requested a smaller unit in order to gain admission to the property.
 - c. Those households who requested a smaller unit to gain earlier admission to the property because of smaller unit availability will take low priority on the transfer list. (Example: a two person household that qualified for a 2-bedroom unit requests a 1-bedroom unit because the waiting list is shorter.) Additionally, those households who requested a smaller unit in order to gain earlier admission to the property must complete their initial lease term in the smaller unit before they will be considered for a transfer to a larger unit, unless other circumstances warrant a transfer prior to the end of the term.

Unit Inspections

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The resident is responsible to maintain the apartment in a clean and sanitary condition so that the health and welfare of the other residents is not endangered. Annual inspections will be conducted to ensure the apartments are being maintained and there are no willful damages to the property. Residents will be notified as to the date and time of these inspections. Inspections may also be required by regulatory agencies and funding entities.

Ongoing Eligibility

Once moved in to the property, residents must continue to meet eligibility requirements of the programs. Management will take into consideration any lease violations, visits from law enforcement and disturbances that interfere with the quiet enjoyment of other residents at the property.

Conclusion

The Agent acknowledges that HUD and the IRS may, from time to time, modify the requirements of their tenant selection regulation or policies. The Agent agrees that, upon reasonable notice, they will amend this plan to satisfy such changes.

Attachment 1

**Owner's Selection/Rejection
Screening Criteria**

1. Inability or unwillingness to cooperate in all aspects of the application process.
 - Providing false information.
 - Mistreating employees and staff.
 - Missing scheduled interviews and meetings.
 - Appearing for meetings inebriated or under the influence of a controlled substance.
2. Inability or unwillingness to care for the unit.
 - Housekeeping standards are not acceptable.
 - Damages caused by resident.
 - Unauthorized alterations.
 - Problems not reported to landlord for timely repairs.
3. Inability or unwillingness to pay rent in a timely manner.
 - Repeated late payments of rent.
 - History of nonpayment of rent.
 - History of other bad credit.
4. Inability or unwillingness to abide by the terms of our lease; some examples are:
 - Allowing unauthorized persons to live in residence or living in someone else's unit as an unauthorized occupant.
 - Interfering with the right of quiet enjoyment of other tenants.
 - Providing false information.
 - Repeatedly exhibiting disruptive, troublesome, or unruly behavior.
 - Owners' having reasonable cause to believe that applicant has an association with street gangs, illegal drug cartels and/or organized crime groups.
 - Not able to control the behavior of all members of the household.
 - Not recognizing the landlord's right to entry.
 - Not providing information necessary for processing application.
5. History of drug abuse and other criminal activity, including but not limited to:
 - A household member evicted from Federally-assisted housing for drug-related criminal activity, for three years from the date of eviction.
 - A household member currently engaged in illegal drug use.
 - Owner's determination that there is reasonable cause to believe that a household member's illegal use or a pattern of illegal use of a drug may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents.
 - A household member including a live-in aide is subject to a lifetime registration requirement under a state sex offender registration program. In accordance with Federal law, the Owner has established standards that prohibit admission to any

Federally-assisted property to sex offenders subject to a lifetime registration requirement under a state sex offender registration program.

- Owner determination that there is reasonable cause to believe that a household member's abuse or pattern of abuse of alcohol interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.
- A household member is currently engaging in, or has engaged in drug-related criminal activity; violent criminal activity; other criminal activity that would threaten the health, safety, or right to peaceful enjoyment of the premises by other residents; or other criminal activity that would threaten the health or safety of the Owner or any employee, contractor, subcontractor or agent of the Owner who is involved in the housing operations.

Owner's Selection/Rejection Screening Procedures and Documentation

1. Inability or unwillingness to cooperate in all aspects of the application process.

Procedure:

- Notify applicant of incomplete application with deadline

Documentation:

- Any documentation necessary to determine eligibility in accordance with the applicable rules/regulations

2. Inability or unwillingness to care for the unit.

Procedure:

- Contact previous landlords (possibly current landlord)
- Review credit bureau report for damages or judgments

Documentation:

- Previous/current landlord verification form
- Credit bureau report

3. Inability or unwillingness to pay rent in a timely manner.

Procedure:

- Review latest six months' rent receipts, comparing to lease/rental agreement requirements
- Contact previous/current landlords
- Review credit history

Documentation:

- Lease or rental agreement and rent receipts or canceled checks for most recent six months
- Previous/current landlord verification form
- Credit bureau report
- Utility bills and receipts/canceled checks for most recent six months

4. Inability or unwillingness to abide by the terms of the lease.

Procedure:

- Verify income and eligibility information
- Conduct interview with all family members present
- Contact previous/current landlords
- Review credit history for judgments, etc.
- Conduct criminal background checks
- Contact local and state police forces; narcotic, gang, street-crime task forces; district/state attorney office representatives; court officers, probation officers; government officials; established neighborhood or street watch representatives; or other reliable sources

Documentation:

- Interview data record
- Verification and other information
- Credit and investigator's reports
- Statements from local and state police forces; narcotic, gang, street-crime task forces; district/state attorney office representatives; court officers, probation officers; government officials; established neighborhood or street watch representatives; or other reliable sources
- Household members' statements (written or documented in writing by application processor)
- Other public written communication or internet posting

5. History of drug abuse and other criminal activity.

Procedure:

- Interview applicant household
- Review public records
- Review state offender registry that will include a registration check in all states where applicant household members have resided (as listed on the application)
- Conduct criminal background checks
- Contact previous/current landlord
- Contact shelters, caseworkers, etc. as indicated by applicant
- Interview and/or review other reliable sources

Documentation:

- Application for Occupancy
- Interview data record
- Police/court records
- Law enforcement agency
- State sex offender registry information that included a registration check in all states where applicant household members have resided (as listed on the application)
- Investigator's reports
- Previous landlord statement (written or documented in writing by application processor)
- Individual's statements (written or documented in writing by application processor)
- Household members' statements (written or documented in writing by application processor)
- Record of conversations and/or statements from shelter workers, caseworkers, other reliable sources, etc.
- Other public communication or internet posting