

**FORT LAWTON HOUSING FOR HOMELESS HOUSEHOLDS
COMMUNITY RELATIONS PLAN
June 16, 2008**

I. OVERVIEW

Community Involvement

The Magnolia Community Relations Work Group comprised of neighbors adjacent to Fort Lawton and interested Magnolia residents volunteered to participate in the production of a written Community Relations Plan in advance of the development of housing for homeless individuals and families at Fort Lawton. The Community Relations Plan specifies the responsibilities of the parties to the plan related to housing and services for homeless individuals and families at Fort Lawton: Archdiocesan Housing Authority, YWCA of Seattle-King County-Snohomish County (YWCA), United Indians of All Tribes Foundation (United Indians) and the Magnolia community. Community Relations Plan Meetings were convened by the City of Seattle Office of Housing for the purpose of receiving and incorporating input from the community. Workgroup meeting to develop and define the Community Relation Plan were held on the following dates and locations:

May 19, 2008 – Catharine Blaine Elementary
June 2, 2008 – Catharine Blaine Elementary
June 19, 2008 – Catharine Blaine Elementary

The purpose of the Community Relations Plan is for the housing provider, their supportive services partners and the Magnolia community to work together and commit to ensure that the housing for homeless individuals and families at Fort Lawton is successful in the community. The Archdiocesan Housing Authority, United Indians and the YWCA are committed to the provisions of the Community Relations Plan and working with the community in the future to finalize the plan. If unforeseen circumstances require significant changes to the provisions of the Plan, the Archdiocesan Housing Authority, United Indians and the YWCA will work with the community on revisions to the Plan.

Selection of Partners

The Archdiocesan Housing Authority was selected by the City of Seattle, through a Notice of Interest (NOI) process, as the lead developer to develop housing for homeless individuals and families as part of the redevelopment of Fort Lawton. The Archdiocesan Housing Authority is pursuing this development in partnership with the YWCA and United Indians. The Archdiocesan Housing Authority will serve as developer of the housing for homeless individuals and families at Fort Lawton and provide supportive services, and property management services. United Indians and the YWCA will provide related supportive services for the homeless individuals and families at Fort Lawton. The Archdiocesan Housing Authority and its partners were selected to develop and operate the housing for homeless individuals and families at Fort Lawton based on their experience, capacity and strength as organizations, as well as the other criteria listed in the Notices of Interest.

NOI Partner Agency Descriptions

Archdiocesan Housing Authority

Established in 1981, the Archdiocesan Housing Authority (AHA) provides a continuum of care for homeless and low-income persons. Twenty-nine day centers, emergency shelters and transitional housing programs offer a warm, safe refuge from the streets, providing homeless men, women and children with a place to bathe, launder clothes, and receive medical attention, alcohol and drug treatment, and job counseling. AHA provides more than 1,850 housing units in 39 programs, serving individuals, families, seniors and persons with special physical and mental needs throughout Western Washington.

<http://www.ccsww.org/>

YWCA of Seattle · King County · Snohomish County

The YWCA's roots can be traced to 1894 when Mrs. Rees P. Daniels moved to Seattle from Washington DC. Mrs. Daniels had been active in the Washington D.C. YWCA and saw the need for such an institution in Seattle. Today the YWCA serves nearly 44,000 women and families every year with programs to end homelessness, create jobs, care for children and youth and prevent violence. Without a home, it's difficult for employers to reach job seekers for an interview. Without a job, it's nearly impossible to get a home. Not having both is a crisis for women and families. The YWCA works with women in need to address multiple challenges and move toward independence, self-sufficiency, safety and dignity for them and their families.

<http://www.ywcaworks.org/>

United Indians of All Tribes Foundation

United Indians of All Tribes Foundation (UIATF) is a 501c3 non-profit organization founded in Seattle, Washington in 1970. The mission of United Indians is to foster and sustain a strong sense of identity, tradition, and well-being among the Indian people in the Puget Sound area by promoting their cultural, economic, and social welfare. This is accomplished through the development and operation of educational, social, economic, and cultural programs and activities benefiting local Native Americans, and by maintaining a strong link with Indian tribes and other urban Indian organizations throughout the State of Washington.

<http://www.unitedindians.org/>

Number of Homeless Housing Units

As part of the Base Realignment and Closure process at Fort Lawton, the City was required to provide notice to homeless housing and service providers to let them know that property at Fort Lawton was available at no cost for homeless housing or services. The federal department of Housing and Urban Development will review the City's plan to determine whether the City has sufficiently balanced the need for homeless housing on site. Based on discussions with HUD and other federal agencies, the City has

determined providing homeless housing in the range of 66-100 units will satisfy this requirement. The homeless housing to be developed on the site will consist of a stand alone building for Native American Elders and other seniors and housing for families that will be intermixed in clusters with market rate housing. The 66 unit baseline comes from a statement of legislative intent in the city council's ordinance purchasing the Capehart property in Discovery Park, which will remove Navy housing and create additional park space within Discovery Park. A more detailed discussion of the policies and rationale that will determine the actual number of homeless units is included in Appendix A to the Community Relations Plan.

The housing descriptions are as follows:

II. HOUSING PROGRAM

The provision of a robust supportive services program has been identified as a key issue in ensuring the success of the housing serving both the homeless individuals and families at Fort Lawton. The following program and supportive services summaries describe the level of services Archdiocesan Housing Authority and its service partners will provide to the residents.

As noted in the Community Relations Plan meetings, this Plan is being drafted at a very early stage of the process. Generally, Community Relations Plans are drafted at the time of funding. The Archdiocesan Housing Authority, United Indians and the YWCA are provided the most complete information that they are able to at this stage of the process. The following program descriptions, descriptions of services, staffing levels and tenant selection criteria are the sponsors' best efforts to describe their plans for the housing at this time. The final program descriptions, descriptions of services, staffing levels and tenant selection criteria will be determined at the time applications are made for funding. When the government and other funders make a funding commitment for this type of housing, the funding is a long-term commitment. For example, the City of Seattle makes twenty-year commitments for operating funds. The Archdiocesan Housing Authority and its partners commit to an open and transparent process with the Magnolia community and pledge to inform and discuss with the community any proposed modifications to the program descriptions, descriptions of services, staffing levels and tenant selection criteria represented in the Community Relations Plan.

Housing for Homeless Individuals

Program Summary

The Archdiocesan Housing Authority and its partner United Indians will provide housing with culturally appropriate supportive services, primarily to homeless Native American Elders and other seniors from the Seattle and King County region. Special outreach and marketing will be made to Native American Elders and Native American Veterans to take advantage of cultural opportunities presented at the site including the proximity of Daybreak Star Indian Cultural Center. Most residents will be over 55 and most will have disabilities ranging from persistent health problems, alcoholism, mental illness or a combination of disorders.

The Archdiocesan Housing Authority will function as the sponsoring developer/owner and provide a baseline of supportive services and property management services once the housing is complete. United Indians will provide culturally appropriate support services to this cohort at the Fort Lawton community.

Supportive Services Summary

The supportive services model of the Fort Lawton housing is to provide a high level of on-site supportive services to residents in their home environment. On-site services allow staff to be more pro-active in their response to resident needs. Needs can be more easily anticipated and responded to quickly; problems can be addressed before they escalate. Case managers will work to engage and develop relationships with residents so that over time the stability, well-being and quality of life of residents will be increased. Building community among residents is essential to this support services model. When residents experience their living environment as their home they become more invested in contributing to a safe and quality place to live.

The program includes a daily on-site meal program together with scheduled traditional meals and events within the Native American community of Puget Sound. The on-site meal program, while addressing the dietary needs of residents, will also be a powerful tool for establishing relationships among residents and building community within the facility. Connecting with cultural services, programs and events through United Indians is another tool in this model to establish community relationships promoting an enhanced quality of life. Limited transportation services will be available to residents for the purpose of accessing off-site service providers, cultural events and related resources.

Where alcohol and other drug services are needed residents will receive on-site and off-site services from partner agencies including United Indians and Seattle Indian Health Board. Service providers will work closely with case managers to support treatment plans.

The support services provided will promote the residents' housing stability and self-sufficiency by assisting residents in accessing financial benefits or employment; acquiring health care benefits and establishing a medical provider; completing eligibility documentation for housing subsidy, medical benefits, and financial benefits; and preventing isolation through participation in community.

Program Linkages

Linkages with other agencies and service delivery systems that residents can access will be accomplished by establishing relationships between Archdiocesan Housing Authority, United Indians, and the YWCA staff and government and community organizations. Staff will develop contacts in the local Department of Social and Health Services (DSHS) offices with financial workers, Supplemental Security Income (SSI) facilitators, and Alcohol and Drug Abuse Treatment and Support Act (ADATSA) screeners. The Resident Services Manager will coordinate efforts with chemical dependency and mental health providers such as Seattle Indian Health Board to develop treatment plans for

residents needing assistance in these areas to maintain housing. Staff will also coordinate health care for residents through the Alesek Institute and the Seattle Indian Health Board and other local medical facilities. For residents looking for employment, AHA has a long-standing relationship with the providers of the Senior Community Service Employment Program sponsored by the American Association of Retired Persons (AARP). This program provides temporary work experience for low income people aged 55 and older. AHA and its partners will develop transportation plans for residents to access off-site services.

Staffing

Archdiocesan Housing Authority staff at the Fort Lawton housing for Native American Elders and other seniors will work as a team to provide an array of services to residents. Supervised by the Program Director, services will be provided by the Resident Services Manager, the Business Manager, the Community Support Coordinator, the Front Desk staff, and a contracted food service provider. Services will be located on site in private staff offices, a common dining room, and community activity rooms.

The Resident Services Manager and the Community Support Coordinator will provide case management services to residents; evaluating residents' needs, providing advocacy and linkages to community resources, intervening in crisis situations, and encouraging participation in meaningful activities. The Archdiocesan Housing Authority's typical case management ratio 1:25. The Business Manager will process tenant leases and apply screening criteria to determine eligibility and compliance with funding requirements. Twenty-four hour Front Desk Staff's primary responsibility will be security. In addition they will provide information and referrals to residents, respond to medical emergencies, intervene in conflict situations, and ensure the safety of the residents' living environment. The meal service program will provide three meals a day to residents. The food service contractor will plan weekly menus to meet the dietary needs of the residents and encourage good eating habits.

Housing Program - Housing for Homeless Families

Program Summary

The Archdiocesan Housing Authority, in partnership with the YWCA, will provide housing and supportive services to homeless families defined as households with at least one parent and one minor child that are deemed homeless using the HUD definition. The YWCA will partner with United Indians and to do specific outreach to Native American families and expect that a large number of residents at Fort Lawton will be from the Native American community. In all other respects, the YWCA expects the demographic profile for families entering this housing program will resemble that of the 1,200+ other homeless families the YWCA serves each year:

- Single-parent household (88%), usually female (95%) with a mean age of 33
- Mean household size of 3
- All extremely low income, often unemployed (89%)
- 69% with mental health issues
- 68% with history of domestic violence
- 39% with major health or medical issues

- 35% with history of chemical dependency
- 33% homeless for more than a year

The Archdiocesan Housing Authority will serve as the developer of the housing and property manager for the family housing. The YWCA will enter into an agreement with the Archdiocesan Housing Authority to provide outreach, screening, intake, needs assessment and case management for the families.

Supportive Services Summary

The YWCA plans to provide core case management and other related services on site. Case management will be intensive, home-based and focused on clients' goals and barriers. Families will complete a lengthy needs assessment and create an action plan suited for their circumstance. Action plans are focused on education, training, employment, wage progression, mental health, family stability and resource procurement, and address children's schooling and childcare. Case managers connect families with necessary support services offered by the YWCA or other providers. Case management, domestic violence advocacy and children's domestic violence counseling will occur predominately in the families' homes, while mental health and chemical dependency counseling, life skills classes, and children's programming will be provided in YWCA offices and shared community spaces provided by the Archdiocesan Housing Authority on the Fort Lawton campus.

YWCA services provided in downtown Seattle for Fort Lawton families will include: employment assessment and training, job placement and retention services, health care access, and Dress for Success. Case management staff also will connect Fort Lawton residents with other providers for services such as legal assistance.

The holistic, coordinated development proposed for this site will be critical to the success of the homeless families the YWCA intends to serve. The YWCA's experience with transition-in-place supportive housing for homeless families makes it clear that socially integrated neighborhoods that offer a continuum of housing options help families maintain housing stability and move forward with their lives. Children in particular benefit from stability in school and the social support network they and their parents are able to build when they maintain their housing in a single community.

Program Linkages

The YWCA works closely with homeless assistance programs throughout Seattle and King County, e.g. Women's Referral Center, Health Care for the Homeless, the Homelessness Intervention Project (specialized employment services for homeless persons), and other providers of affordable housing, domestic violence shelters and related services for homeless women and families in the Seattle area. The YWCA looks forward to creating a network of referral and support for the homeless families coming to rebuild their lives at Fort Lawton. YWCA case managers will work with families to develop transportation plans to access off-site services.

Staffing

Planned staffing levels at Fort Lawton will average one case manager per 15 households overall, with families supported at a 1:10 ratio for the first several months. Case managers will report to a Housing Program Manager located in the YWCA's Seattle offices.

III. RESIDENT SCREENING AND SECURITY

The Archdiocesan Housing Authority and its partners are committed to ensuring the safety and security of the housing for homeless households at Fort Lawton. The Archdiocesan Housing Authority will make available to the community an onsite contact who will be available twenty-four hours a day, seven days a week.

The Archdiocesan Housing Authority will develop and own both the housing for homeless individuals and homeless families and provide property management services at both the individual and family housing. The YWCA and United Indians will make appropriate referrals and provide related supportive services to residents. Applicant households will be screened for rental history, credit and criminal history, and general program eligibility prior to residency. Upon move-in tenants sign leases requiring them to accept responsibility for their actions and those of individual household members, their guests, or other persons on the premises with their consent.

Examples of the Archdiocesan Housing Authority's screening criteria include the following (a complete sample screening criteria as Attachment A):

- Any conviction for any activity concerning sexual abuse or assault is grounds for denial. This includes, but is not limited to, any member of the household who is subject to a registration requirement under a state sex offender registration program.
- Any conviction within the past twenty (20) years for homicide is grounds for denial of residency.
- Any conviction within the past ten (10) years for any crime of violence, fraud, theft, or other crime which establishes that the applicant's tendency might constitute a direct threat to the health or safety of other individuals or result in the substantial physical damage to the property of others is grounds for denial.
- Any conviction within the past five (5) years for illegal drug use, manufacture or distribution of a controlled illegal substance is grounds for denial.
- The YWCA agrees to screen the likelihood of families being pursued by battering spouses or others as part of the referral process.

Building Security

- Twenty-four hour front desk staff will be provided at the homeless individual facility whose primary responsibility will be security. In addition front desk staff will

provide information and referrals to residents, respond to medical emergencies, intervene in conflict situations, and ensure the safety of the residents' living environment. The Archdiocesan Housing Authority is also committed to providing a high level of security and response to emergencies at the homeless family facility.

- A visitation/guest policy will be established holding residents accountable for the actions of their guests.
- The Archdiocesan Housing Authority maintains a “no weapons” policy at its program sites which will be extended to Fort Lawton.

Tenant Behaviors

- No tenant, no member of the tenant's family or household nor a guest or any other person visiting a tenant shall engage in criminal activity on or near the apartment complex, including drug-related criminal activity, or other criminal activity or drug and alcohol abuse that threatens the health and safety of the tenants or staff or hinders the peaceful enjoyment of the housing premises.
- Twenty-four hour emergency contact information will be provided to neighbors to respond to issues that may arise in the neighborhood.

IV. Community Integration

There is a strong sense of community in Magnolia and an expressed concern regarding the impacts, positive and negative, of integrating homeless individuals and families in the community. To help ensure the successful integration of the homeless individual and families within the community, the Archdiocesan Housing Authority, its supportive services partners and Magnolia community agree to the following commitments:

- The Archdiocesan Housing Authority intends to develop community space as part of their senior housing to be used primarily for programs and services for the residents. The Archdiocesan Housing Authority is agreeable to making the community space available to the greater community when it is not otherwise being used. The Archdiocesan Housing Authority encourages community uses that engage the homeless residents.
- The Archdiocesan Housing Authority, YWCA, and United Indians will identify volunteer coordinators as points of contact for community members interested in volunteering in the programs serving homeless individuals and families.
- The community may work to provide opportunities to integrate the homeless households with local groups, organizations, school programs, etc.
- The community may encourage the engagement of local churches and community organizations in the programs and facilities serving the homeless households.

- Some community members have expressed an interest in creating a community garden so that all residents and neighbors may have an opportunity to garden together.

V. INFRASTRUCTURE AND QUALITY OF LIFE

The impacts of the redevelopment of Fort Lawton on existing infrastructure and other quality of life issues are being addressed as part of the parallel reuse planning process. However, specific impacts of the housing for the homeless households may be addressed here within the Community Relations Plan.

School Issues

No preference will be sought from the Seattle School District for children living in the homeless family housing that prioritizes their placement in local schools above those of other children in the community.

Transportation

The Archdiocesan Housing Authority and its partners will advocate for adequate public transportation at the site and provide limited transportation necessary for residents to access public services and community resources including, but not limited to medical services, Daybreak Star, and the grocery store.

Building Design

- The Archdiocesan Housing Authority and its partners will actively seek community input on the design and/or rehabilitation of the structures it develops for housing for homeless households at the Fort Lawton site.
- The building design(s) will include adequate parking onsite limiting any potential parking overflow into the neighborhood.

VI. ACCOUNTABILITY

Oversight of the Community Relations Plan will be conducted by the City of Seattle Office of Housing. In addition to the Community Relations Plan, the various public and private funders and investors will execute regulatory agreements and covenants with the Archdiocesan Housing Authority and its partners governing the operations of the housing for homeless households and families. The regulatory agreements may have terms extending up to fifty-years.

The Office of Housing and other funders and investors have active asset management teams that will oversee, monitor, and inspect the operations and performance of the housing discussed in this Community Relations Plan. The regulatory agreements will include penalties and recourse provisions in the event the Archdiocesan Housing Authority and its partners fail to perform under any agreement related to the housing that they are operating at Fort Lawton.

Appendix

Unit Determination Process

In determining the number of housing units for the homeless at the Fort Lawton site, the City of Seattle must balance the following factors:

1. The regulations of the Base Realignment and Closure (BRAC) process and its requirements for responsiveness to notices of interest from homeless housing providers;
2. The City's commitment to the King County 10 Year Plan to End Homelessness;
3. The policies outlined in the City's consolidated plan that determine how federal funds are allocated;
4. The policies outlined in the City's comprehensive plan that determines land use;
5. The City's policies related to the siting of low-income units;
6. The financial realities of creating a successful mixed income community and of funding and operating successful housing for the homeless.

The following discussion outlines how each of the six factors contributes to determining the final number of homeless units.

BRAC and Homeless Needs

Disposition of property via the Base Realignment and Closure process is controlled by federal law that identifies priorities for disposal. Federal agencies have priority for reusing existing federal facilities. Next in order are representatives of the homeless. The BRAC law expressly states that the federally designated local reuse authority ("LRA", City of Seattle) must actively solicit notices of interest from homeless housing providers. The City of Seattle did so in Fall 2006 and received requests for 304 housing units for homeless, serving populations ranging from chronically mentally ill to homeless families. In reviewing these requests, the City, in its capacity as LRA, is charged with balancing the number and type of requests for housing for the homeless with additional eligible requests for property (in this case, self-help housing and open space). The Department of Housing and Urban Development has made clear that LRAs are to be responsive to the notices of interest received from homeless housing providers.

In addition, the Department of Defense has made clear that they are seeking to receive value for the properties they are surplussing in BRAC 2005. Reuse plans submitted by LRAs that do not provide value will potentially be returned as unacceptable and could result in the Army taking control of the reuse process.

As a result, while the City would not be expected to accept all notices of interest, it cannot refuse them all either. Creating between 66 and 100 units is less than 30% of the total requested but does achieve a balance between the needs of the homeless and those of the Army.

10 Year Plan to End Homelessness

The City of Seattle has made a commitment to the 10-Year Plan to End Homelessness. Approved in 2005, the Plan calls for 9,500 units (a mix of new and existing) to be created for homeless individuals and families throughout King County. A large number of these units will be created within the City of Seattle. To date, the City has helped fund over 800 units, but many more are needed. The expectation is that these units will be spread throughout the city.

Comprehensive Plan

The City of Seattle's Comprehensive Plan determines land use policies in the City and identifies a number of policies and goals that relate to the siting and development of affordable housing. According to the Plan, the City shall

“Promote a broader geographical distribution of subsidized rental housing by generally funding projects in areas with less subsidized rental housing and generally restricting funding for projects in neighborhoods outside of downtown where there are high concentrations of subsidized rental housing”

In evaluating and eventually funding a portion of the housing for the homeless to be constructed at Fort Lawton, the City must consider the comprehensive plan policies. As the attached map demonstrates, Magnolia presently has a low number of subsidized rental housing as compared to other neighborhoods in Seattle.

Consolidated Plan

The City of Seattle Consolidated Plan identifies policies and strategies for how the City will use its federal funds, including housing funds. Based on the 2000 census and identified in the 2005-2008 consolidated plan, the greatest housing need in the City of Seattle is for extremely low income households (0-30% Area Median Income), of which the homeless are the greatest number. The City is required to address this need via its allocation of federal funds for affordable housing.

In addition, the Consolidated Plan identifies “Good Neighbor Guidelines” that are designed to ensure the success of affordable housing throughout the City. They include

“It is the policy of the City of Seattle that OH funding of affordable housing not be refused solely on the basis of concerns expressed by neighbors; the City supports and is committed to promoting diversity in Seattle neighborhoods.”

Siting Policies

The Consolidated Plan also includes the City's siting policies for extremely low income housing, which includes homeless individuals and families. The siting policy states that the Office of Housing will not fund or certify as consistent with the Consolidated Plan

any housing that brings the total number of units of extremely low income housing in any census block group to more than 20%.

Fort Lawton is located in Census Block Group 57, which presently has 26 units of housing for extremely low income households, out of a total of 2,941 (0.9% of the total). Adding between 66 and 100 units will bring the total to between 92 and 126. This will be between 3.1% and 4.3% of the total units in the block group. Please see the attached sheet that identifies the Magnolia census block groups and the number of very low income housing units in each group.

Financial Viability

The final factor in considering the appropriate mix and number of units at the For Lawton site is the financial feasibility of both the overall development as well as the housing for the homeless. In creating a successful mixed income community, it is important to balance the types of unit. Achieving the correct mix of units (townhouses, multi-family, single family homes, etc) is key to the financial success of the development.

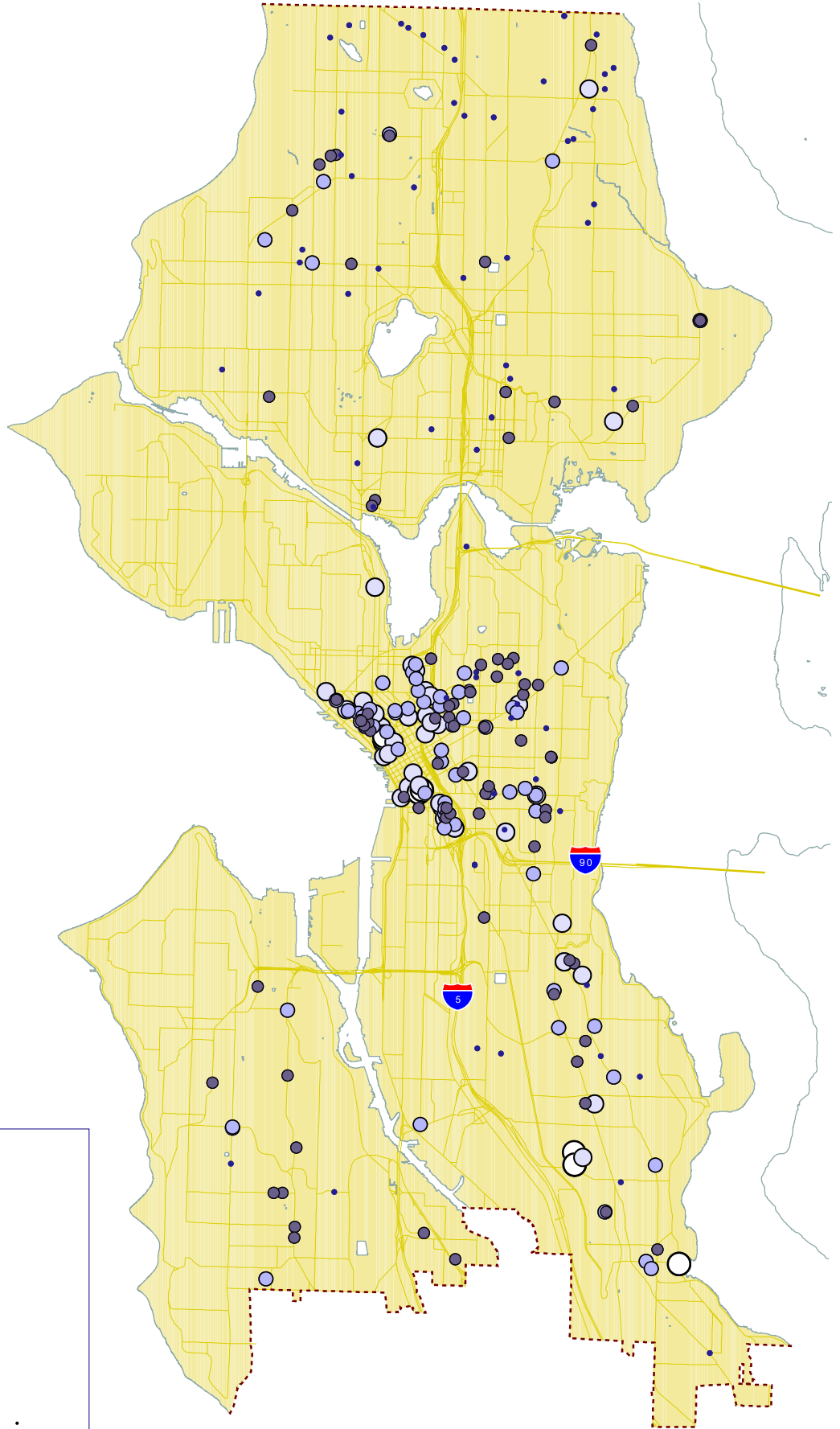
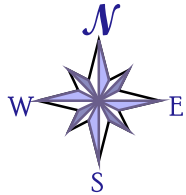
Regarding the homeless housing, obviously developments that are too large can have a negative impact on residents and the neighboring community. However, experience both nationally and locally has shown that programs that are too small also suffer because of decreased financial feasibility. This feasibility is driven by the need to develop enough units to achieve economy of scale, on both the construction side and the operating side in order for the housing to be successful long-term. In building affordable housing, there are a number of fixed costs that must be spread across all units, including architecture, legal fees, and certain financing costs. Having too few units means that the cost of developing any single unit is prohibitively expensive. There is also a scale requirement for the buildings and programs to be operated effectively. Too few units increases costs for on-site management and counseling as well as basic building operations.

Conclusion

Considering all six factors, creating between 66 and 100 units of housing for the homeless accomplishes the following:

- is consistent with the City's commitment to the 10 Year Plan to End Homelessness;
- is in line with the policies outlined in the City's Consolidated Plan and Comprehensive Plan;
- complies with the City's siting policy;
- is responsive to the number of units requested via the NOI process under BRAC while also balancing other requests and the Army's need for value, and;
- ensures the success of the proposed housing by achieving the economies of scale necessary for financial and operating viability.

DISTRIBUTION OF LOW-INCOME HOUSING UNITS FUNDED BY CITY OF SEATTLE



- 1 - 10 units
- 11 - 30 units
- 31 - 60 units
- 61 - 175 units
- 176 - 366 units

--- City Limits

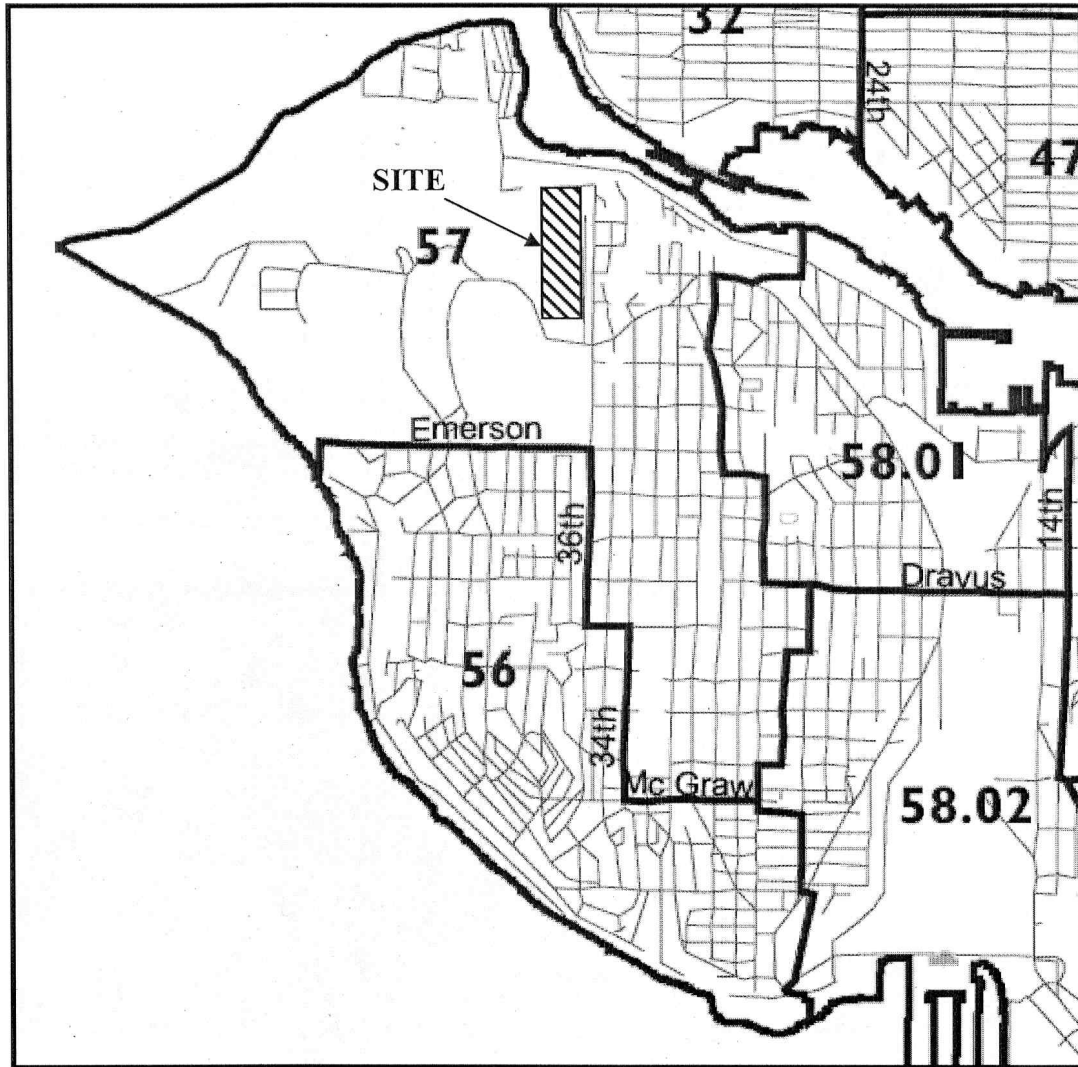


PREPARED BY
City of Seattle
Office of Housing
JUNE 16, 2008



VERY LOW INCOME HOUSING IN MAGNOLIA

Total Units and Percentage



Census Tract	# of Units < 30% AMI	Total # of Units in Tract	Percent of Total	% of Total w/ Additional Homeless Units*
56	0	2,785	0%	N/A
57	26	2,941	0.9%	3.1% - 4.3%
58.01	2	2,701	0.1%	N/A
58.02	10	2,668	0.4%	N/A
TOTAL	38	11,095	.3%	1.2%

*NOTE: This reflects percentages based on a range of homeless units from 66 to 100.

SAMPLE FORT LAWTON SCREENING\REJECTION CRITERIA

All adult applicants in a household will be screened for rental history, credit and criminal history, and general program eligibility prior to residency. This includes police officers or security personnel living on-site. The screening of live-in aides at initial occupancy, and the screening of persons or live-in aides to be added to the tenant household after initial occupancy involve similar screening activities. Both live-in aides and new additions to the tenant household will be screened for drug abuse and other criminal activity. An application may be rejected for any one of the following reasons:

- ♦ The applicant/family is not eligible based on program requirements.
- ♦ Submission of false or untrue information on the application, or failure to cooperate in the verification process.
- ♦ The applicant has a history of unacceptable or unsatisfactory credit or criminal history as reported by a credit agency or other organization. *Please see Credit Criminal Screening Criteria for more information.*
- ♦ Negative reference from current or previous landlord, including but not limited to late rent, NSF (non-sufficient funds) checks, lease violations, evictions, etc.
- ♦ The household (including a Live In Aide) size is not appropriate for this unit. *Please refer to Unit Size Standards & Guidelines.*
- ♦ Failure to sign designated or required forms and/or documents upon request.
- ♦ The applicant cannot pay the appropriate security deposit at move-in.
- ♦ This will not be the applicant's only residence and he/she will pay an assisted rent.
- ♦ The applicant has repeatedly (more than twice) been offered a housing unit and, for other than a verified medical reason, he/she has refused to take the unit offered.
- ♦ The applicant is not a Citizen, National or eligible non-Citizen (as defined by HUD).
- ♦ The applicant is not capable of fulfilling the lease, with or without assistance.
- ♦ A negative criminal history as defined in the *Criminal or Drug-Related Activity*.
- ♦ By HUD formula, the applicant cannot show a need for the subsidy assistance,

(where applicable) or the household income exceeds the **HUD** limits.

- ♦ The applicant was unable to provide proof of SSNs as required by HUD and management policy.

CRIMINAL OR DRUG-RELATED ACTIVITY

Upon move-in tenants sign leases requiring them to accept responsibility for the actions of individual household members, their guests, or other persons on the premises with their consent. No tenant, no member of the tenant's family or household nor a guest or any other person visiting a tenant shall engage in criminal activity on or near the apartment complex, including drug-related criminal activity, or other criminal activity or drug and alcohol abuse that threatens the health and safety of the tenants or staff or hinders the peaceful enjoyment of the housing premises. "Drug-related criminal activity" means the illegal manufacture, sale, distribution or use of a controlled substance (as defined in Section 102 of the Controlled Substance Act).

No tenant, nor member of the tenant's household or family, nor any guest or other person shall engage in any act intended to facilitate criminal activity, drug-related activity on or near the apartment complex.

No tenant, nor members of the tenant's household or family will permit the dwelling unit to be used for, or to facilitate, criminal activity, including drug-related criminal activity, regardless of whether the individual engaging in such activity is a member of the household, family or a guest.

No tenant, nor members of the tenant's household or family will engage in the manufacture, sale or distribution of illegal drugs on or near the apartment complex or elsewhere.

No tenant, nor shall any member of the tenant's household or family, guest or other person, engage in acts of violence, including, but not limited to, the unlawful discharge of firearms on or near the apartment complex.

Violation of the above provisions shall be a material noncompliance violation of the lease and good cause for termination of the lease. A single violation of any of these provisions shall be deemed a serious violation and material noncompliance with the lease. It is understood and agreed that a single violation shall be good cause for termination of the lease. Unless otherwise provided by law, proof of violation shall not require criminal conviction, but shall be by a preponderance of the evidence.

RENTAL, CREDIT, & CRIMINAL SCREENING CRITERIA

Landlord References:

1. If a prior landlord reported the applicant(s) damaged property or lease violations the applicant can be denied. This includes lease violations, disturbing the peace, harassment, poor house keeping habits, improper conduct or other negative reference against the household.
2. Any eviction within the past three (3) years is automatically grounds for denial. This includes any household members who have been evicted from Federally-assisted housing within the last three years for drug-related criminal activity. If the evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program or circumstances leading to the eviction no longer exist, management will review on a case-by-case basis.
3. Management may accept a rental history of no more than two (2) late payments of rent in a six (6) month period, with verification of all charges paid and no more than one (1) NSF check in a one (1) year period. Anything beyond this specification can be grounds for denial.
4. Any evidence of illegal activity including drugs, gangs, weaponry, etc., will be grounds for denial.
5. Grossly unsanitary or hazardous housekeeping habits can be grounds for denial.
6. Any debt balance owing to a prior management company or housing complex may need to be paid prior to move-in.
7. Lack of rental history is not grounds for denial.
8. In some cases, a payee-ship will be required for Fort Lawton Housing to accept the potential resident. Refusal to obtain a payee-ship would be grounds for denial.

Case Management References:

1. If a prior landlord reported the applicant(s) damaged property or lease violations the applicant can be denied. This includes lease violations, disturbing the peace, harassment, poor house-keeping habits, improper conduct or other negative reference against the household.
2. Any evidence of illegal activity including drugs, gangs, weaponry, etc., will be grounds for denial.

3. Grossly unsanitary or hazardous housekeeping habits can be grounds for denial.
4. In some cases, a payee-ship will be required for Fort Lawton Housing to accept the potential resident. Refusal to obtain a payee-ship would be grounds for denial.

Credit Criteria:

1. Applicants with more than two (2) accounts in negative standing within the past two (2) years will be denied. Examples of negative standing are late payments, collections, bad credit status, etc., unless health or disability concerns are affecting the applicant and are causing the financial debt.
2. Public records such as collections and judgments are included as negative accounts.
3. Each bankruptcy item or foreclosure proceeding within the past five (5) years is rated as the worst account and counted individually.
4. Federal and State Tax liens within the past three (3) years are counted as a negative account. Prior to the three (3) year period we may request proof of payment/release on any Lien over \$1000.00 that is still on the applicant's credit history.
5. Financial Aid or School Loans in negative standing are counted.
6. Any amount showing owed to a prior management company can be grounds for denial. We reserve the right to ask for proof of payment.
7. Any other item(s) that appear on the credit report, which would reflect negatively on the applicant, will be reviewed and a decision will be made based on the date, source, and amount of the action.
8. Lack of credit history is not grounds for denial.

Criminal Background Criteria:

1. Any conviction for arson is grounds for denial.
2. Any conviction within the past twenty (20) years for homicide is grounds for denial.
3. Any conviction within the past five (5) years for illegal drug use, manufacture or

distribution of a controlled illegal substance is grounds for denial.

4. Any conviction within the past ten (10) years for any crime of violence, fraud, theft, or other crime which establishes that the applicant's tendency might constitute a direct threat to the health or safety of other individuals or result in the substantial physical damage to the property of others is grounds for denial.
5. Any conviction for any activity concerning sexual abuse or assault is grounds for denial. This includes, but is not limited to, any member of the household who is subject to a registration requirement under a state sex offender registration program.
6. Any other felony conviction within the past five (5) years can be grounds for denial.
7. Any household member who is currently engaging in illegal drug use is grounds for denial. This can include a pattern of illegal drug use that may interfere with the health, safety, or right to peaceful enjoyment of the premises by other tenants.
8. Any household member who has a pattern of alcohol abuse that may interfere with the health, safety, or right to peaceful enjoyment of the premises by other tenants is grounds for denial.

Mitigating Circumstances

Situations governing the acceptance of mitigating circumstances will be reviewed on a case-by-case basis. Examples allowing for such reviews include:

- Controlled substance possessions – less than three (3) years since conviction, with an active case management or completed drug rehabilitation program.
- Felonies involving property only – less than two (2) years since conviction, with a probation officer or case manager.
- Felonies involving weapons and/or person – less than five (5) years since conviction, with case management or greater than five (5) years since conviction with (5) years free of criminal activities.

NOTE: All applicants in a household will be processed as one approval or denial for an apartment. If any one of the applicants has negative rental history, negative credit history or negative criminal history all applicants will be denied.