



Housing Division

Buckeye Community Hope
Foundation Housing Division
3021 E. Dublin-Granville Rd.
Columbus, Ohio 43231
614.942.2020
614.942.2000 fax
www.buckeyehope.org

January 25, 2016

Paula J. Wallrich, AICP
Deputy Planning Director
Village of Tinley Park
16250 S. Oak Park Avenue
Tinley Park, Illinois 60477

RE: The Reserve at Tinley Park - Resident Selection Process
Other Questions

Dear Mrs. Wallrich,

On behalf of our board of directors, I wish to thank you and the Village for your continued support for The Reserve at Tinley Park rental housing development initiative. Over the course of your discussions with local government and community representatives, you generated additional questions about the security features, resident screening, tenant selection process, and other development examples, and references.

As we discussed at the planning commission meeting, it is very important and a goal for us to strive to meet "precise conformance" with all Village codes. With the assistance of the Village and your direction and guidance, we are pleased to have achieved that goal. As a rental community, there are many other factors incorporated into our design and development features such as:

- Federal Fair Housing Laws
- American with Disability Laws
- State and Local Building Codes
- New Energy Codes
- Alternative Energy – Solar Power

To date, Buckeye has developed over 3,600 units. The current occupancy of our portfolio is 97%+. The best solution to insure The Reserve has great residents is to implement strong a Tenant Selection Plan. We utilize and require our on-site property manager, RLJ Management Co., Inc., to adhere to the attached plan. There simply is no option and no choice in this matter.

Because we enforce our Tenant Selection Plan criteria and rules, Buckeye Community Hope Foundation (BCHF) maintains a very high occupancy of our properties managed by our management company, RLJ Management Co., Inc. This process and Plan is key for an Owner. For your review, our Tenant Selection Plan is attached. Although the entire document reflects the professionalism of our third party property manager, the strongest areas within this document relevant to occupancy rules / criteria are located on pages 11-14 that include:

- Screening Applicants & Criteria
- Screening Criminal History
- Sexual Offender Zero Tolerance Policy
- Screening Credit History
- Verification Of Eligibility

When you review each section of our Tenant Selection Plan, one can understand how RLJ Management Co., Inc. keeps our more than 3,600 units at 97% occupancy. Good tenant profiles and good residents, make good neighbors. As you are aware, when utilizing housing tax credits funded by Illinois Housing Development Authority, additional rules and regulations must be followed to remain in compliance. It is important to Buckeye to provide the most competitive and high quality rental option in the Village, and we firmly believe the Reserve exceeds these expectations.

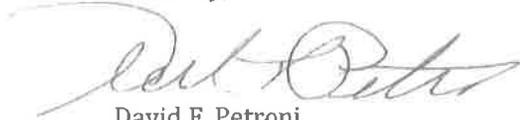
For your review and dissemination, we have also included a few similar properties. BCHF does not have a similar property in the portfolio that matches the high quality design presented to the planning commission last week. In fact, this development is what is commonly called, "Design Built". This means, our entire team has worked together to meet local, state, and federal rules / codes, but formulated the building envelope to fit on the site. It is unique, so our examples will not exactly mimic the style.

As part of our specifications, the Reserve will also incorporate the following security features:

- All exterior entrances will be locked for resident access only
- All unit doors will be steel with high quality dead bolt locks
- Each floor will be monitored by video cameras
- All access doors will be monitored by video cameras
- The parking areas will be monitored with cameras
- The general grounds will be monitored with video cameras

As a future property owner in the Village, we are excited to offer an affordable and high quality housing option for residents who live and work within Tinley Park. I hope this additional information is helpful as you field questions within the community. Please call with questions at your convenience.

Sincerely,



David F. Petroni
Vice President

Attachments: Tinley Park RLJ Tenant Selection Plan
 General sample product and references

Cc: Amy Connolly, Tinley Park Director of Planning

Tenant Selection Plan for Low Income Housing Tax Credit

PROPERTY NAME	The Reserve At Tinley Park
PROPERTY CONTACT NAME	
ADDRESS	Corner of 183 rd and Oak Park Ave,
CITY, STATE , ZIP	Village of Tinley Park, IL
PHONE	
FAX	



The Purpose of the Tenant Selection Plan

The Tenant Selection Plan is to help ensure that residents are selected for occupancy in accordance with LIHTC requirements. Below is an alphabetized index of topics that are established management policies and procedures that comply with the LIHTC requirements.

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PROGRAM & PROJECT ELIGIBILITY

Program eligibility determines whether applicants are eligible to receive assistance. Applicants and residents must meet the following requirements to be eligible for occupancy and housing assistance.

- The family's annual income must not exceed program income limits.
- Proof of Social Security numbers for all household members must be provided within 90 days of the date of your application.
- The unit for which the family is applying must be the family's only residence.
- An applicant must agree to pay the rent required by the program.
- Applicants must meet the requirements under the Student Rule.
- All information reported by the family is subject to verification.
- Various subsidy or insurance programs may impose additional occupancy restrictions.
- Students who are the head or co-head of a household are eligible for assistance if they meet the U.S. Department of Education's definition of an independent student.

Project Eligibility

Project eligibility establishes whether applicants are eligible to reside in a specific property to which they have applied. The property you have applied at is described below:

Type of Property

LIHTC

Household/Resident Type

Individual programs often serve more than one resident population. However, individual properties may not. The property you have applied at is described below:

Multi-Family	

INCOME LIMITS

LIHTC requires that properties incorporate the most recently published income limits when determining eligibility. Income limits are updated annually, usually around February. For this property, qualified applicant households must meet the following income limit requirements.

Please see attached chart.



OCCUPANCY STANDARDS

Occupancy standards serve to prevent the over or underutilization of units that can result in an inefficient use of housing assistance. Occupancy standards also ensure that residents are treated fairly and consistently and receive adequate housing space.

It is the policy of RLJ Management, Inc. that at move in, no more than two people may share a bedroom.

Number of Bedrooms	Min. # Household Members	Max. # of Household Members
1	1	2
2	2	4
3	3	6
4	4	8

Applicants that qualify for more than one unit size are given the opportunity to choose the unit size they prefer when added to the waiting list.

SECTION 504 REHABILITATION ACT & REASONABLE ACCOMODATIONS

Section 504 of the Rehabilitation Act of 1973

The Act prohibits discrimination based upon disability in all programs or activities operated by recipients of federal financial assistance. Although Section 504 often overlaps with the disability discrimination prohibitions of the Fair Housing Act, it differs in that it also imposes broader affirmative obligations on owner/agents to make their programs as a whole, accessible to persons with disabilities.

These obligations include the following:

- Making and paying for reasonable structural modifications to units and/or common areas that are needed by applicants and residents with disabilities, unless these modifications would change the fundamental nature of the project or result in undue financial and administrative burdens;
- Operating housing that is not segregated based upon disability or type of disability, unless authorized by federal statute or executive order;
- Providing auxiliary aids and services necessary for effective communication with persons with disabilities;
- Performing a self-evaluation of the program and policies to ensure that they do not discriminate based on disability.
- Developing a transition plan to ensure that structural changes are properly implemented to meet program accessibility requirements; and
- Operating programs in the most integrated setting appropriate to the needs of qualified individuals with disabilities.



SECTION 504 REHABILITATION ACT & REASONABLE ACCOMODATIONS

To ensure equal treatment of all disabled applicants or residents that may wish to make a reasonable accommodation or modification of the existing premises or policy, all such requests are to be initially referred to the property manager. The property managers will then meet with the applicant or resident and discuss the proposed accommodation/modification and explain what information is required on the written request for permission.

Once the applicant or resident's written request for permission to make an accommodation or modification is submitted to the property manager, it will be forwarded to the 504 Coordinator for discussion about what items will be required for a final approval agreement between the applicant/resident and the landlord.

RLJ Management Inc., has designated one person for the property to coordinate efforts to comply with Section 504 requirements. This person is referred to as the Section 504 Coordinator: Name of Section 504 Coordinator: TBD

FAIR HOUSING AND CIVIL RIGHTS ACT

Title VI of the Civil Rights Act of 1964 and the Fair Housing Act of 1988, makes it unlawful to refuse to rent or sell or refuse to negotiate for the rental or sale of or otherwise make available or deny a dwelling to any person because of race, color, age, religion, sex, national origin, familial status or handicap. Management is pledged to the letter of said policy for the achievement of equal housing for all. Management will make reasonable accommodations for individuals with handicaps/disabilities during the application process as needed. Such accommodations may include changes in the method of completing the application and/or other services.

Privacy Policy

It is the policy of management to guard the privacy of individuals as per the Federal Privacy Act of 1974, and to ensure the protection of such individual's records maintained by management.

LANGUAGE ACCESS PLAN FOR L.E.P.

Our Language Access Plan will be executed by identifying our Limited English proficient (LEP) populations in all owned and managed portfolios operated by RLJ Management Co., Inc. Our goals are to identify our L.E.P by language needs, develop affirmative fair housing marketing plans accordingly, provide L.E.P sensitivity training to staff when assisting L.E.P customers, provide oral or written interpreter/translation services, and monitor and update our Language Access Plan to ensure continued compliance and equal delivery of services to all L.E.P populations in our service areas.

STUDENT RULE

Students include those attending public or private elementary schools, middle or junior high schools, senior high schools, colleges, universities, technical, trade, or mechanical schools, but does not include those attending on-the-job training courses or those pursuing a GED. Household contains at least one occupant who is not a student, has not been a student, and will not be a student for five or more months during the current and/or upcoming calendar year (months need not be consecutive).



Household contains all students, but is qualified because the following occupant(s) is/are a part-time student(s). Documentation of part time student status is required for at least one member of the household.

Household contains all full-time students for five or more months during the current and/or upcoming calendar year (months need not be consecutive). Must meet one of the following exemptions:

- Receiving assistance under Title IV of the Social Security Act - (e.g.TANF)
- Previously under the care and placement responsibility of the local county children services agency (i.e. foster care)
- Enrolled in a government-sponsored job-training program
- A single parent household with at least one dependent child. The parent is not the dependent of another individual and the child is only a dependent of the resident or the other non-resident parent.
- Married and eligible to file a joint income tax return

Households composed entirely of full-time student that are income eligible and satisfy one or more of the above conditions are considered eligible. If exemptions 1-5 above are considered NO, or verification does not support the exemption indicated, the household is considered an ineligible student household.

VIOLENCE AGAINST WOMENS ACT (VAWA)

Under the Violence Against Women Act (VAWA), the Department of Justice Reauthorization Act of 2005, Public Law 109-162, offers the following protections against eviction or denial of housing based on domestic violence, dating violence or stalking.

- An applicant's status as a victim of domestic violence, dating violence or stalking is not a basis for denial of rental assistance or for the denial of admission, if the applicant otherwise qualifies for assistance or admission.
- The Landlord may not consider incidents of domestic violence, dating violence or stalking as serious or repeated violations of the lease or other "good cause" for termination of assistance, tenancy or occupancy rights of the victim of abuse.
- The Landlord may not consider criminal activity directly relating to abuse, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that abuse.
- The Landlord may request in writing that the victim or a family member on the victim's behalf, certify that the individual is a victim of abuse and that the Certification of Domestic Violence, Dating Violence or Stalking, Form HUD-91066, or other documentation as noted on the certification form, be completed and submitted within 14 business days, or an agreed upon extension date, to receive protection under the VAWA. Failure to provide the certification or other supporting documentation within the specified timeframe may result in eviction.

CITIZENSHIP AND IMMIGRATION STATUS

By law, only U.S. citizens and eligible non-citizens may benefit from LIHTC. Compliance with these rules ensures that only eligible families receive. These requirements apply to families making application to the property, families on the waiting list, and tenants. This paragraph



describes the procedures we must use to determine applicant eligibility based on citizenship/immigration status.

- Housing is restricted to the following:
 - U.S. citizens or nationals; and non-citizens who have eligible immigration status.

All applicants for assistance must and will be given notice of the requirement to submit evidence of citizenship or eligible immigration status at the time of application.

All family members, regardless of age, must declare their citizenship or immigration status.

Non-citizens (except those age 62 and older) must sign a Verification Consent Form and submit documentation of their status or sign a declaration that they do not claim to have eligible status. Non-citizens age 62 and older must sign a declaration of eligible immigration status and provide a proof of age document. U.S. citizens must sign a declaration of citizenship. A mixed family with one or more ineligible family members may receive prorated assistance, continued assistance, or a temporary deferral of termination of assistance.

Applicants who hold a non-citizen student visa are ineligible, as are any non-citizen family members living with the student. Non-citizen students and their non-citizen families. Non-citizen students are not eligible for continuation of prorated or temporary deferral of termination.

A non-citizen student is defined as an individual who is as follows:

1. A resident of another Country to which the individual intends to return;
2. A bona fide student pursuing a course of study in the United States; and
3. A person admitted to the United States solely for the purpose of pursuing a course of study as indicated on an F-1 or M-1 student visa.

This prohibition applies to the non-citizen student's non-citizen spouse and children. However, spouses and children who are citizens may receive assistance. For example, a family that includes a non-citizen student married to a U.S. citizen is a mixed family.

Administrative Restrictions on Assistance to Non-Citizens

Management is responsible for administering the restriction to non-citizens in accordance with regulations. When administering the restriction, we must treat all applicants equally, applying the same non-citizen rule procedures without regard to race, color, national origin, sex, religion, disability, or familial status, and must comply with the nondiscrimination requirements.

Reviewing a Family's Citizenship/Immigration Status

We generally consider citizenship/immigration status once for each family, but will do so more frequently if immigration status or family composition is likely to change (e.g., when a family member applies for a change in immigration status)

We determine the applicant's citizenship or immigration status during the initial eligibility determination, prior to move-in.

As part of the annual recertification process, we must determine the citizenship/immigration status of tenants from whom we have not previously collected the proper documentation or whose documentation suggested that their status was likely to change.

If the status of a family member in a mixed family changes from ineligible to eligible, the family



may request an interim recertification.

The required evidence of citizenship/immigration status for any new family member must be submitted at the first interim or regular recertification after the person moves to the unit.

Although the extension period may not exceed 30 days, we may establish a shorter extension period based on the circumstances of the individual case.

We must inform the applicant in writing if an extension request is granted or denied. If the request is granted, we must include the new deadline for submitting the documentation. If the request is denied, we must state the reasons for the denial in the written response. When granting or rejecting extensions, we must treat applicants consistently.

We must deny assistance to an applicant upon the occurrence of any of the following:

1. The applicant fails to submit evidence of citizenship (i.e., the declaration) and eligible immigration status by the date specified.
2. The applicant submits evidence of citizenship and eligible immigration status on a timely basis, but DHS primary and secondary documentation does not verify eligible immigration status of a family member; and
3. The family does not pursue a DHS appeal or informal hearing rights;
4. The family pursues a DHS appeal and informal hearing, but the final decision is against the family member.

SOCIAL SECURITY NUMBER DISCLOSURE

ALL household members, and any new household members added to a lease must provide

- The complete and accurate SSN assigned to each member of the applicant's household and
- Documentation necessary to prove that the Social Security Number is accurate (verification)

Waived from Disclosure: For eligibility purposes, the requirement to disclose a Social Security Number is waived if no Social Security Number has been assigned and:

- **62 or older as of January 3, 2010** – household member is 62 or over as of January 31, 2010 and eligibility determination started **before** January 31, 2010
- **Ineligible non-citizen-** if household member is an ineligible non citizen, this household member does not qualify for assistance therefore household assistance will be prorated.

90 Days to Disclose: If a household member is under the age of six, *and does not have a Social Security Number*, the applicant household will have 90 days to provide the Social Security Number and adequate documentation that the Social Security Number is accurate. Under certain circumstances, the owner/agent may provide an additional 90 days to allow the resident to obtain Social Security Number information.

Denial for Non-Disclosure: The owner/agent may deny housing, in accordance with the provisions governing the program, if the assistance applicant does not meet the applicable SSN disclosure, documentation, and verification requirements.

SSN Fraud: If the applicant/resident deliberately provides an inaccurate Social Security



Number, the owner/agent may pursue additional penalties due to attempted fraud.

SINGLE RESIDENCE CRITERIA

A household is eligible for housing if the unit will be the household's only residence. This rule is meant to ensure that the affordable housing is for only one unit for a household and provides housing to as many eligible households as possible.

APPLICATION PROCEDURES

Applications are taken on _____ from _____ with the office being closed one hour during the day for lunch. Other times are available by appointment. All applications are to be completed in the office to ensure accuracy of information, and that all forms are signed and dated by all adult members of the household. Owners may also send out and receive applications by mail to accommodate persons with disabilities, who, as a result of their disabilities, cannot complete the application in the office. Applications are taken on a first-come, first-serve basis and placed on our waiting list based on the date and time of application.

WAIT LIST- OPENING & CLOSING

The Waiting List for this property will remain open at all times to give all applicants the opportunity for housing.

WAIT LIST- SELECTING APPLICANTS

Applications are processed in advance of available units to allow applicants to prepare for moving. You will be notified when your name has reached the top 5 of the waiting list to further process your application. We will notify you first by phone. If we are unable to contact you by phone, we will mail you a letter notifying you that you must contact the management office within ten (10) days to begin processing of your application. *If you do not respond within the 10 days, your application will be removed from the Waiting List.* Applicants are housed based on their date and time of application.

Please note that it is our policy to conduct in-house transfers prior to housing applicants from our waiting list. Refer to the Unit Transfer section of the Tenant Selection Plan.

WAIT LIST – UPATING & REMOVAL

Updating Wait list

The waiting list will be updated on a quarterly basis. Each applicant will be mailed a letter asking that they contact the property within twenty on (21) days to verify their continued interest. Applicants that do not respond within the specified time frame, or who respond that they are no longer interested will be removed from the waiting list. If the letter is unable to be delivered by the United States Postal Service, the application will be deemed ineligible and removed from the waiting list.

Applicants on the waiting list must contact the property, in writing, if any information on the application changes (i.e. address, phone number, number of household members, number of future household members, income). If the household composition changes, a decision will be



made as to whether the household needs the same or different unit size. If a determination is made that the household qualifies for more than one unit size the applicant will be given the opportunity to choose which unit size they prefer.

If as a result of the household composition change, it is determined that the household will be on the waiting list for a different size unit than originally indicated, the household will be added to the bottom of the waiting list for the new unit size.

Removal of applicants from Wait List

The property manager must document removal of any names from the waiting list with the date and time of the removal.

The property manager will remove an applicant's name from the waiting list when:

- Applicant requests that the household be removed
- Applicant fails to keep application information up to date based on the requirements described in this plan
- Applicant was advised, in writing, of the requirement to tell the property manager of his/her continued interest in housing by a particular time and failed to do so.
- Letters sent to the head of household are unable to be delivered by the U.S. Postal Service.

If an applicant is removed from the list, and subsequently the property manager determines that an error was made in removing the applicant, the applicant will be reinstated at the original place on the waiting list.

If an applicant is removed from the waiting list and later, the applicant household feels that they are now qualified for assistance/tenancy, the applicant household must submit a new application. The application will be placed on the waiting list as of the date and time it has been filled out at the property office.

WAIT LIST PREFERENCES

Our policy is to give preference on the wait list to existing tenants waiting on transfers, applicants displaced by government actions, or applicants displaced by disaster.

Existing Tenant Transfers

Existing residents who have submitted a request for a unit transfer are given preference on the waiting list. Refer to the Unit Transfer section of the Tenant Selection Plan.

Displacement by Government Action

Verification from a unit or agency of government that an applicant has been or will be displaced by activity carried on by an agency of the United State or by any State or local government body or agency in connection with code enforcement or a public improvement or development program is required at the time of application.

Displacement by Disaster

Verification from a unit or agency of government that an applicant has been or will be displaced as a result of a presidentially declared disaster that results in the uninhabitable of an applicant's unit is required at the time of application.



SCREENING APPLICANTS & CRITERIA

All applicants for housing will be screened according to the criteria set forth in the Admission Standards. These criteria are:

1. Past performance in meeting financial obligations, especially rent;
2. Bad record of residency such as destruction of property, disturbance to neighbors, poor housekeeping habits;
3. Involvement in criminal activities, including but not limited to felonies, in the past 60 months;
4. Record of evictions or terminations from housing programs & private landlords;
4. Applicants ability and willingness to comply with the lease;
5. An applicant's misrepresentation of any information related to eligibility, income, household composition, previous landlords etc.; and
6. Applicants must be of legal age to enter a lease.

SCREENING CRIMINAL HISTORY

Criminal history reports will be investigated for each applicant household member 18 years of age or older. Screening for criminal offenses will be subject to denial, if they are related to **SEXUAL OFFENSES, DRUGS and VIOLENCE**. HUD has established standards that prohibit admission of:

- **Evicted for Drugs:** Any household containing a member(s) who was evicted in the last three years from federally assisted housing for drug-related criminal activity.
- **Use of Illegal Drugs:** A household in which any member is currently engaged in illegal use of drugs or for which the owner/agent 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.
- **Sexual Offender:** Any household member who is subject to any state sexual offender registration requirement will be denied admission.
- **Violence & Violent Crime:** You or any member of your household that have a history of violence against other persons. Or if at any time, you or any member of your household has been convicted of a crime using a weapon against another individual.
- **Alcoholism Behavior:** Any household member's behavior, from alcoholism abuse that may has lead to violent or offensive behavior and/or crime that will interfere with the health, safety, and right to peaceful enjoyment by other residents. The screening standards must be based on alcoholism behavior, not a medically diagnosed condition of alcoholism or alcohol abuse.
- **Felony Conviction:** If in the last seven years, you or any member of your household have a felony conviction for any type of crime that is less than 7 years old will be subject to denial.
- **Misdemeanor Conviction:** if you or any member of your household has a misdemeanor conviction or are a habitual offender with misdemeanor convictions that relate to sexual offenses, drugs or violence, you will be subject to denial. *Example but not limited to: public intoxication, disorderly conduct, menacing, soliciting prostitution, vandalism.*
- **Criminal Offense against Employees & Property:** If at any time, you have committed other criminal activity that would threaten the health, safety of the owner, or any employee, contractor, subcontractor or agent of the owner who is involved in housing operations or the vandalism and destruction of property.



SEXUAL OFFENDER ZERO TOLERANCE POLICY

In accordance with HUD regulations a zero tolerance policy is in effect to prevent lifetime sex offenders from receiving federal housing assistance. Current regulatory requirements include the screening of new applicants and existing tenants for any sexual offenses and lifetime registration of any state sex offender list.

- **Property Management:** will conduct criminal background screening with RLJ credit/criminal background screening system that retrieves data. They will confirm any sexual offense violations and enforce our policy. Termination of tenancy will be aggressively pursued to ensure the highest level of public safety in federally assisted housing.
- **Current Tenants:** At annual recertification's all current tenants will be required to self certify if they or any of their household members is subject to a lifetime state sex offender registration program in any state. Tenants will be informed at recertification that screenings of sexual offender registration lists will be conducted according to HUD regulations.
- **Applicants:** applicants will self certify on their application if they or any of their household members is subject to a lifetime state sex offender registration program in any state. Any applicant and their household members who is a registered sex offender will be denied housing and their application rejected.

SCREENING CREDIT HISTORY

A credit report will be made for head of household/co-head. The purpose of reviewing an applicant's credit history is to determine how well applicants meet their financial obligations. The applicant's entire credit history is reviewed. Please note that lack of a credit history is not considered poor credit. The following areas will be screened according to criteria:

- **Credit Screening:**
Credit screening is completed by an outside company. Rental delinquencies, utility delinquencies, bankruptcy, etc. will be taken into consideration. If an applicant is demonstrates a poor credit history, the application will be rejected.
- **Rental History:**
All applicants must provide current and previous landlord information. This information will be used to verify applicant's ability to pay rent and adhere to a lease. If an applicant has a unfavorable landlord reference or has a public record of eviction for nonpayment of rent or failure to adhere to a lease, they will be subject to denial. If any member of the applicant household has been evicted from any property owned or managed by RLJ Management, Inc., that applicant household will be rejected.
- **Reasonable Accommodations to Screening**
Owners may consider extenuating circumstances in evaluating information obtained during the screening process to assist in determining the acceptability of an applicant for tenancy. If the applicant is a person with disabilities, the owner must consider extenuating circumstances where this would be required as a matter of reasonable accommodation.
- **Failed to pass screening:**
Any applicants who did not pass our screening criteria may appeal the rejection notice. Applicants are advised to follow the instructions on their rejection letter to call the Property Manager to request reconsideration. All reconsiderations will be sent to the District Manager for a determination upon review of information given by the applicant



and any third party verifications obtained.

VERIFICATION OF ELIGIBILITY

Information needed to determine applicant eligibility shall be obtained, verified, and the determination of applicant eligibility performed, in accordance with HUD and property eligibility requirements.

Preliminary Eligibility

The property manager will make a preliminary eligibility determination when placing a household on the waiting list or initiating final eligibility tasks. Once the applicant comes to the top of the waiting list, the application will be reviewed to ensure that there are no obvious factors that would make the applicant ineligible. If information on the application indicates that the applicant household does not meet the eligibility and/or screening requirements, the household will be rejected.

Final Eligibility

If there is no information on the application that would deem the applicant household ineligible, then a criminal background check will be performed. Criminal background must be checked to reveal any previous criminal activity that would deem the household ineligible.

If the application review and the criminal background do not reveal information that would deem the applicant household ineligible, a credit check will be performed to see if the household meets the property credit screening criteria. If the applicant does not meet the credit screening criteria, the household will be rejected.

If the applicant household successfully passes the criminal and credit checks, verification of the following will commence: Verification of assets, income and expenses.

VERIFICATION METHODS

The property manager shall obtain verifications in compliance with requirements set forth in the HUD Handbook 4350.3. After the preliminary eligibility determination, no decision to accept or reject an application shall be made until information provided on the application form and during subsequent interviews has been collected and any necessary follow-up interviews have been performed.

All information relative to the following items must be verified as described in these procedures. The following information will be verified on all applicants

- Eligibility for admission
- Allowances
- Compliance with Resident Screening Criteria
- Special program requirements
- The need for an accessible unit

Verifications will be attempted in the following order:

- Third-party written
- Third-party oral with a record kept in the file
- Copies of third party documents provided by the household (i.e. Social Security or agency printout, award letter, pay stubs, bank statements, pharmacy printouts, payment book stubs for medical insurance premiums, etc.)
- In the absence of any of the above, affidavits from the household



Each file will be documented, when appropriate, to show that the property staff attempted to obtain third-party written documentation before relying on some less acceptable form of information.

Sources of Information:

Sources of information to be checked may include, but are not limited to

- The applicant by means of interviews
- Present and former housing providers/landlords
- Credit checks and management record services, etc.

Forms of Verification

Documentations required as part of the verification process, may include, but are not limited to:

- Checklists completed as part of the interview process and signed by the applicant
- Verification forms completed and signed by third parties
- Reports of interviews, etc.

At a minimum, such reports will indicate the date and time of the conversation, source of the information, name and job title of the individual contacted, and a written summary of the information received.

Management staff will be the final judge of the credibility of any verification submitted by an applicant. If the staff considers documentation to be doubtful, it will be reviewed by management staff who will make a ruling about its acceptability. Management staff will continue to pursue credible documentation until it is obtained or the applicant is rejected for failing to produce it.

Period for Verification

Only verified information that is less than 120 days old may be used for verification or recertification. Verified information not subject to change (such as a person's date of birth) need not be re-verified.

Verifying the need for an Accessible Unit

When an applicant requests an accessible unit, the property manager will conduct inquiries to:

- Verify that the applicant is qualified for the unit, which is only available to persons with a disability or to persons with a particular type of disability. For example, an applicant with a physical disability who uses a wheelchair may not be eligible for a unit that is specifically designed and intended for a person with a visual disability.

Verify that the applicant needs the features of the unit as an accommodation to his or her disability.

VERIFICATION CONSENT AND REFUSAL TO SIGN

All adult members of a household must sign consent forms and, as necessary, verification documents, so that the property manager can verify sources of household income and household size. The property manager must consider a household ineligible if the adult members refuse to sign applicable consent and verification forms.

Each household member age 18 and older and each household head, spouse or co-head regardless of age must sign the following forms:

- Applicant's/Resident's Consent to the Release of Information.
- Verification by Owners of Information Supplied by Individuals who apply for Housing.



All adults must sign the forms regardless of whether they report income. All adult members of an applicant or resident household must sign individual verification forms, authorizing the property manager to verify household income and other applicable eligibility factors (e.g., disability status). Consent and verification forms protect the rights and privacy of Residents and applicants by allowing them to have control over any information collected about them.

Provisions for Refusal to Sign

If the applicant or any adult member of the applicant's household, does not sign and submit the consent forms as required in 24 CFR 5.230, the property manager must deny admission to the applicant.

REJECTIONS & RECONSIDERATION PROCEDURES

Rejecting Ineligible or Unqualified Applicants

The property complies with applicant rejection requirements set forth in the HUD Handbook 4350.3. Management reserves the right to reject applicants for admission if it is determined that the applicant or any member of the household falls within any one or more of the following categories:

- Failure to meet the HUD indicated eligibility requirements for the assistance program.
- Refusal to sign appropriate verification documents
- Misrepresentation: Willful or serious misrepresentation is the application procedure for the unit or certification process for any government assisted dwelling unit.
- Failure to respond to management inquires for additional information during the application process.
- Failure to meet the minimum credit score.
- Criminal history.
- Unsatisfactory landlord reference, if applicable

The property manager will promptly notify the applicant, in writing, of the denial of admission or assistance. The result of the eligibility determination will be sent to the head of household, as indicated on the application, via First Class Mail.

Rejection Notice will include:

- The specifically stated reason(s) for the rejection, and
- The applicant's right to respond to the property manager in writing (or in an equally effective format) or request a meeting within fourteen (14) days to dispute the rejection.
- That persons with disabilities have the right to request reasonable accommodations to participate in an informal hearing.
- The 800 number to contact The Credit Reporting Agency to obtain a free copy of their credit report.

After an initial rejection, applicants have the right to request an appeal. Management will follow the grievance process in compliance with the requirements set for in the HUD handbook 4350.3.

The process of requesting an appeal is known as a **Request For Reconsideration**. Applicants must first make a request in writing, provide an explanation for reconsideration and submit request to the site manager. Applicants are strongly advised to call the 800 number listed on the initial rejection notice to obtain a free copy of their credit report, before a reconsideration interview is conducted.



The District Property Manager who was not involved in the initial decision to deny admission or assistance will conduct a telephone interview with the applicant to discuss the applicant's rejection and letter of request for reconsideration.

During the reconsideration interview, applicants will be asked to explain derogatory accounts, public records, civil judgments, or any criminal offenses as listed on their credit/criminal reports. Applicants may also be asked to provide additional documentation to justify their statements and be subject to certain conditions for a final approval. The process of Reconsideration does not guarantee an approval and the owner reserves the right to uphold an initial rejection.

Reconsideration final approvals will be given within five (5) business days of the telephone interview, compliance personnel will advise the applicant in writing of the final decision on eligibility and will not disclose that decision on the phone during the interview process.

Applicants must provide a working telephone number for contact with time of availability to call. Three attempts will be made to conduct a phone interview. If applicant is not available after those attempts an "unable to contact" notice will be issued. Applicants will then be given (5) five business days to contact the District Property Manager for reconsideration interview. Failure to contact after such notice will result in a decision to "uphold initial rejection" and the reconsideration will be null and void and the file closed. Rejected applicants will then have to reapply at a later date to be processed again.

FRAUD POLICY

Any information provided by the applicant that verification proves to be untrue may be used to disqualify the applicant for admission on the basis of attempted fraud. Unintentional errors that do not cause preferential treatment will not be used as a basis to reject applicants

TRANSFER POLICY & PROCEDURES

Unit transfers will only be approved under the following (2) conditions:

- **Change in Family Composition-** increase in family members requiring additional room, or decrease in family members and market/waiting list demands require vacating an under housed unit.
- **Reasonable Accommodation** - a household member's disability certified by a doctor. For example, a resident with a physical disability might need a transfer to an accessible unit, or a unit on the ground floor, or a larger unit to accommodate a live-in aide. In these cases, these households will be added to the waiting list and listed with an existing resident preference and housed **first**, to other applicants on the waiting list. This "preference" is *non-transferable* to any other RLJ property and will only be enforced within the apartment community the application was intended for. If a tenant household is being moved to a different unit as a reasonable accommodation for a household member's disability, then the owner **must** pay for the move unless doing so would constitute an undue financial and administrative burden.
- **Unit Transfer Request & Approvals-** Tenant must place a completed application for transfer at the management office. Prior to transfer approval, tenant must meet the following criteria:
 - 30 day notice to move in writing submitted to management
 - Proof of ability to establish utility
 - Met occupancy standard requirements for larger, smaller or ADA unit



- Met obligations of one year lease and in good standing with no account balances
- No more than 3 lease violations in prior year, passed unit inspections with no damages
- New Rental Application and lease is required
- New TIC and first months rent properly prorated.

Unit Transfer Wait List:

Upon approval of a unit transfer, existing residents will have preference over applicants on the waiting list, unless the current number of vacancies at the property is creating an undue financial burden on the property. A unit transfer waiting list will be kept in order of date and time of request. As apartments become available, the unit transfer list will be utilized first prior to going to the regular waiting list.

Unit Transfer and Security Deposit

Security deposit is transferable to a new unit upon approval of a unit transfer.

SECURITY DEPOSIT

The property manager must collect a security deposit at the time of move-in/ initial lease execution. The amount of security deposit established at move-in does not change when a resident's rent changes. The property manager will comply with any applicable state and local laws governing the security deposit. The resident is expected to pay the security deposit from his/her own resources, and/or other public or private resources.

Security Deposits At Move In:

Security deposit and First Month's Rent must be paid in the form of money order or certified bank check only. After the security deposit and first month's rent are paid the resident may then begin using personal checks.

Security Deposit At Move Out: Security deposit is reimbursable and is issued upon vacating a unit with proper 30 day notification. Any charge backs for rents owed, or damages to property will be applied accordingly. Security Deposit reimbursements will be dispersed within 30 days of an official move-out. The amount reimbursed will be paid by check and made out to the resident or individual designated by the resident.

INSPECTIONS

Move In Inspection:

All apartments must undergo a move-in inspection by the property manager. These inspections include not only interior but also exterior inspections. The move-in inspection is an opportunity to familiarize the resident with the property and the unit, as well as to document its current condition.

Move Out Inspection:

Upon the unit being vacated by the resident, the property manager will perform a move-out inspection to ensure there are no damages to the unit. The property manager will list the damages on the move-out inspection form and compare it with the move-in inspection form to determine if the damage is reasonable wear and tear or excessive damage. The resident will be given prior notice of the move-out inspection and be allowed to accompany the property manager if the resident chooses.



Periodic Inspection:

In addition, the property manager will conduct unit inspections to determine that appliances and equipment are in good working order. Service requests will be made for anything requiring repair. Also the unit inspection ensures that the resident is keeping the unit in a clean and sanitary condition.

Owner/Agent or its authorized contractor(s) has the right to inspect the unit and the entire property. These inspections assure that the owners are fulfilling their obligations under the regulatory agreements and/or subsidy contract and that the resident is provided with decent, safe, and sanitary housing.

CHANGES IN FAMILY COMPOSITION

Management must approve change of family composition and screen any new person requesting to be added to the household. Anyone age 18 or older must complete an application **before** he/she moves into the unit. The proposed new household member will be considered an applicant and must pass the screening for criminal history.

Live In Aides Added to Lease

The policy applies to live-in aides as well. Resident selection criteria will also be applied to live-in aides, except for the criteria regarding credit performance or the ability to pay rent on time because live-in aides are not responsible for rental payments. However, live-in aides must meet other screening criteria established by management. Income and/or allowances received by live-in aides will not be considered.

Newborn

Information about newborn household members must be provided to management within 14 days of the birth of a child

CHANGES TO TENANT SELECTION PLAN

Applicants will be notified in writing when the Tenant Selection Plan undergoes significant change. At that time, applicants will be:

- Given an opportunity to review the new plan
- Notified of changes to preferences
- Asked if they wish to remain on the waiting list

If an applicant household does not respond, that household will be deemed ineligible and removed from the waiting list. The current resident selection plan, in place at the time of final eligibility determination, will be used to determine eligibility.

