Property Management Plan

- List of Managed Properties
- CPM Management Plan
- ACHIEVEability Resident Selection Criteria and Intake Forms

Mission First Housing Group Philadelphia Housing Authority RFQ P-004440 Haddington III Preservation Initiative November 21, 2014 Columbus Property Management & Development, Inc. (CPM) will serve as management agent, and maintenance provider for Haddington III. CPM is a 501(c)(3) Pennsylvania nonprofit corporation with a mission to provide quality property management and development services to affordable housing projects serving low-income and special needs individuals. Backed by over 20 years of experience, the company combines traditional real estate techniques with a social mission to deliver high-quality, green community assets throughout the mid-Atlantic region.

CPM currently manages 1,658 units in Pennsylvania, 195 units in Delaware, 747 units in Washington, DC, and 47 units in Maryland. The portfolio includes 16 low-income housing tax credit projects totaling 839 units, and 11 HUD Section 811 projects totaling 107 units. In addition, CPM manages 125 fifteen-year Section 8 rental subsidies that were awarded by the Department of Housing & Urban Development, 548 project-based Section 8 rental vouchers awarded by the Philadelphia Housing Authority and the District of Columbia Housing Authority, and 50 rental vouchers under HUD's Mainstream Housing for Persons with Disabilities program.

CPM specializes in turning around troubled assets and re-syndicating expiring tax credit projects. The organization also plays a key role in linking its tenants to community-based supportive services which help elevate the quality of life and maintain stability. Employees at all levels are provided training through IREM and PMA as well as specialized LIHTC training and programs offered through HUD. In addition, CPM staff regularly receives Fair Housing Training by HUD personnel.

Enclosed please find a list of CPM's managed properties.

CPM will assign a property manager, part time, to the project, who will be based at CPM's office in Center City Philadelphia. The property manager will be overseen by the Senior Director of Property Management, whom is also based in Center City.

CPM will be managing Haddington III as part of Mission First Housing Group and ACHIEVEability's strategic alliance. Enclosed please find CPM's management plan, which includes operation methodologies, and ACHIEVEability's resident selection criteria and intake forms for its Family Self Sufficiency Program.

| | | Type of | Type of | | Subsidy | Number of | |
|---|--|------------|--------------|------------|---------|-----------|---------------|
| Name and Address of Development | Name and Address of Owner | Structures | Construction | Income Mix | Program | Units | Size of Units |
| Fells Point Station | Fells Point Station LLC, 1330 New | | New/Historic | | | | |
| 1621 Bank Street, Baltimore, MD | Hampshire Ave, NW, Washington , DC | mid-rise | Rehab | Low Income | None | 47 | 1, 2 BR |
| The SeVerna on K | SeVerna Phase II LLC, 1330 New Hampshire | | | Low Income | | | |
| 43 K Street NW, Washington, DC | Ave, NW, Washington , DC 20036 | High rise | New | & Market | None | 133 | 0, 1, 2 BR |
| | MM Washington Redevelopment Parnters | | | Low Income | | | |
| House of Lebanon | LLC, 1330 New Hampshire Ave, NW, | | New/Historic | & Market | | | |
| 27 O Street NW, Washington, DC | Washington, DC | mid-rise | Rehab | Rate | None | 82 | 0, 1, 2 BR |
| JW King Senior Center | JW King Seniors, LP, 1330 New Hampshire | | New | | | | |
| 4638 H Street SE, Washington, DC | Ave, NW, Washington , DC | mid-rise | Construction | Low Income | None | 74 | 1, 2 BR |
| The SeVerna | Severna LLC, 1330 New Hampshire Ave, | | New | | | | 0, 1, 2, 3, 4 |
| 1001 1st Street NW, Washington, DC | NW, Washington, DC | mid-rise | Construction | Low Income | None | 60 | BR |
| Dahlgreen Courts | | | | | | | |
| 2502 & 20 10th St., NE, | Dahlgreen Courts LLC, 1330 New | | Substantial | | | | |
| Washington, DC | Hampshire Ave, NW, Washington, DC | high rise | Rehab | Low Income | Sec 8 | 96 | 0, 1, 2 BR |
| Golden Rule Apts | GRA Properties LP, 1100 New Jersey Ave | 8 | New | | | | •, -, |
| 901 New Jersey Ave NW, Washington, DC | NW, WDC 20001 | high rise | | Low Income | Sec 8 | 183 | 1, 2, 3 BR |
| Golden Rule Plaza | Golden Rule Limited Partnership, 1100 New | ingii nise | New | Low meenie | 500 0 | 105 | 1, 2, 5 DR |
| 1050 New Jersey Ave NW, Washington, DC | Jersey Ave NW, WDC 20001 | high rise | | Low Income | Sec 8 | 119 | 0, 1, 2 BR |
| New Hope II | New Street LP, 2042-48 Arch St., | ingii iise | Substantial | Low meome | 500 0 | 117 | 0, 1, 2 DK |
| 130, 134 S., New St. & 127, 137 S. Queen St., New Hope, | Philadelphia, PA 19103 | rowhome | Rehab | Low Income | None | 18 | 1, 2 BR |
| 150, 154 S., New St. & 127, 157 S. Queen St., New Hope, | Dover Housing Development Corporation | Townome | Substantial | Low meome | None | 10 | 1, 2 DK |
| 39 S. New Street, Dover DE | 2042-48 Arch St., Philadelphia, PA 19103 | rowhome | Rehab | Low Income | None | 2 | 1, 2 BR |
| 39 S. New Sueer, Dover DE | 2042-48 Alch St., Philadelphia, PA 19105 | garden, | Kellab | Low Income | None | 2 | 1, 2 DK |
| Lagany Procompation Initiativa | Legacy Preservation Initiative LP, 2042 Arch | U | Substantial | | | | |
| Legacy Preservation Initiative | . | | | тт | | 120 | 0.1.0.00 |
| Scattered Sites, Philadelphia, PA | Street, Philadelphia, PA 19103 | midrise | Rehab | Low Income | PBA S8 | 139 | 0, 1, 2 BR |
| MPB School Apartments | MPB School Apartments, LP, 2042-48 Arch | | Substantial | . . | | | |
| 2811-2819 W. Sedgley Ave., Philadelphia, PA | St., Philadelphia, PA | garden | Rehab | Low Income | None | 28 | 2, 3 BR |
| Walnut Hill West | Arch VII-LIH Walnut Assoc., LP, 2042-48 | | Substantial | | | | |
| 116-134 S. 56th St. & 5601 Walnut St., Philadelphia, PA | Arch St., Philadelphia, PA | rowhome | Rehab | Low Income | PBA S8 | 32 | 0, 1, 2, 3 BR |
| Temple II North Gratz | Arch VI Temple North Gratz Street, LP, | | Substantial | | | | |
| 1505-1547 N. Gratz St., Philadelphia, PA | Philadelphia, PA | rowhome | Rehab | Low Income | PBA S8 | 40 | 1, 2, 3, 4 BR |
| Temple I North 16th | Arch V Temple North 16th Street, LP, 2042- | | Substantial | | | | |
| 1703-1743 N. 16th St., Philadelphia, PA | 48 Arch St., Philadelphia, PA | rowhome | Rehab | Low Income | PBA S8 | 58 | 1, 2, 3, 5 BR |
| Frankford Ave. LP | Frankford Ave., LP, 3023 Frankford Ave., | | Substantial | | | | |
| 3036-3042 Frankford Ave., Philadelphia, PA | Philadelphia, PA | rowhome | Rehab | Low Income | None | 10 | 2, 3 BR |
| Kings Highway | Kings Highway Phase II Assoc., LP, c/o | | Substantial | | | | |
| 2927-3026 Frankford Ave., Philadelphia, PA | CPM, 2042-48 Arch St., Philadelphia, PA | rowhome | Rehab | Low Income | None | 31 | 1, 2, 3, 4 BR |
| Gratz Commons | Gratz Commons, LP, 120 Riverside Plaza, | | Substantial | | | | |
| 2122-2140-42 N. Gratz St., Philadelphia, PA | Chicago, IL | rowhome | Rehab | Low Income | PBA S8 | 23 | 1, 2, 3 BR |
| Powelton Gardens | Arch III Assoc., LP, 2042-48 Arch St., | | Substantial | | 1 | 1 | |
| 4046-4052R Powelton Ave., Philadelphia, PA | Philadelphia, PA | garden | Rehab | Low Income | None | 16 | 1, 2 BR |
| | | | | | | | ĺ. |
| 1 | | | Substantial | | | | |
| Lovell Gardens | Arch II Assoc., LP, 2042-48 Arch St., | | Substantial | | | | |

| | | Type of | Type of | | Subsidy | Number of | |
|---|---|------------|---------------|---------------|----------|-----------|-----------------|
| Name and Address of Development | Name and Address of Owner | Structures | Construction | Income Mix | Program | Units | Size of Units |
| Melon I Corporation | Melon I Corporation, 2042-48 Arch St., | | New | | | | |
| 3616-28 Melon St., Philadelphia, PA | Philadelphia, PA | garden | Construction | Low Income | HUD 811 | 10 | 1 BR |
| Mantua I Corporation | Mantua I Corp., 2042-48 Arch St., | 0 | New | | | | |
| 3613-19 Fairmount Ave., Philadelphia, PA | Philadelphia, PA | garden | Construction | Low Income | HUD 811 | 10 | 1BR |
| Monument Mews | Monument Mews, LP, 2042-48 Arch St., | 8 | New | | | | |
| 4100 Edgely St. Philadelphia, PA | Philadelphia, PA | garden | Construction | Low Income | PBA S8 | 60 | 1, 2, 3, 4 BR |
| Powelton Heights | 2044 Columbus, LP, 2042-48 Arch St., | 8 | New | | | | 7 7 7 |
| 4113-4118 Warren St., Philadelphia, PA | Philadelphia, PA | garden | Construction | Low Income | PBA S8 | 48 | 1 BR |
| Bustleton HDC | Bustelton HDC, 2042-48 Arch St., | Burnen | Substantial | | 121150 | | 1 DIC |
| 6727-35 Bustleton Ave., Philadelphia, PA | Philadelphia, PA | garden | Rehab | Low Income | HUD 811 | 11 | 1, 2 BR |
| Crease-Dyre HDC | Crease-Dyre HDC, 2042-48 Arch St., | townhouse | Substantial | Low meome | 1100 011 | 11 | 1, 2 DK |
| 1327-37 Crease St. & 1647 Dyre St., Philadelphia, PA | Philadelphia, PA | garden | Rehab | Low Income | HUD 811 | 11 | 0, 1, 3 BR |
| Columbus III HDC | Columbus III HDC, 2042-48 Arch St., | garden | Substantial | Low meome | 1100 011 | 11 | 0, 1, 5 DK |
| 419 Chandler St., Philadelphia, PA | Philadelphia, PA | garden | Rehab | Low Income | HUD 811 | 6 | 1, 3 BR |
| 419 Chandler St., Filladelpilla, FA | 1260 Housing Development Corporation, | garuen | Substantial | Low income | 110D 811 | 6 | 1, 5 D K |
| 5222 Leonat St. Dhiladalahia DA | | ainala | | I ou Incomo | None | 1 | 2 DD |
| 5322 Locust St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA 1260 Housing Development Corporation, | single | Rehab | Low Income | None | 1 | 3 BR |
| | | | NT / A | | | 0 | 1.00 |
| 1710-12 Rhawn St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | None | 8 | 1 BR |
| | 1260 Housing Development Corporation, | | 3.7/ 4 | | | | 1.55 |
| 306 E. Loney St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | None | 8 | 1 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 7314 Rockwell St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | None | 11 | 1 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 3408 Rhawn St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | None | 27 | 1, 2 BR |
| Castor HDC | Castor HDC, 2042-48 Arch St., Philadelphia, | | Substantial | | | | |
| 7900-7902 Castor Ave. | PA | garden | Rehab | Low Income | HUD 811 | 10 | 1 BR |
| Center South HDC | | | | | | | |
| 433 McKean St., 119 Mercy St. & 1213 Spruce St., | Center South HDC, 2042-48 Arch St., | duplex | Substantial | | | | |
| Philadelphia, PA | Philadelphia, PA | single | Rehab | Low Income | HUD 811 | 10 | 1, 2 BR |
| Walnut HDC | Walnut HDC, 2042-48 Arch St., | mid-rise | Moderate | | | | |
| 2211 Walnut St. & 700 S. 19th St., Philadelphia, PA | Philadelphia, PA | garden | Rehab | Low Income | HUD 811 | 12 | 0, 1 BR |
| Sheila D. Brown Women's Center | 1260 Housing Development Corporation, | | New | | | | |
| 2000-04 Ellsworth St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | Construction | Low Income | PBA S8 | 9 | 2 BR |
| Parkside Preservation | | Č | | | | | |
| 4104-4244 Parkside Ave., 4201 Girard Ave. & 1237-1243 | Parkside Preservation Assoc., LP, 2042-48 | | Substantial | | | | |
| Belmont Ave., Philadelphia, PA | Arch St., Philadelphia, PA | rowhome | Rehab | Low Income | PBA S8 | 82 | 0, 1, 2, 3 BR |
| | 1260 Housing Development Corporation, | | | | | | , , , |
| 4601-09 Blakiston St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | PBA S8 | 30 | 1 BR |
| | 1260 Housing Development Corporation, | 8 | Substantial | | | | |
| 1729 N. 28th St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | single | Rehab | Low Income | None | 1 | 5 BR |
| Northeast II | Ditman II Associate, LP, 2042-48 Arch St., | | Substantial | 2011 Income | 1.010 | - | |
| 8020 Ditman St., Philadelphia, PA | Philadelphia, PA | garden | Rehab | Low Income | PBA S8 | 34 | 1, 2 BR |
| Northeast I | Keystone I Associates, LP, 2042-48 Arch St., | Sarach | Substantial | | 1 0/1 00 | 57 | 1, 2 DK |
| 6424 Keystone St., Philadelphia, PA | Philadelphia, PA | garden | Rehab | Low Income | PBA S8 | 23 | 1 BR |
| 0424 Reystone St., Finadelpina, PA | r iniadeipina, rA | garuen | Reliau | Low income | 1 DA 30 | 23 | 1 DK |

| Name and Address of Development | Name and Address of Owner | Type of Structures | Type of Construction | Income Mix | Subsidy Program | Number of Units | Size of Units |
|--|--|-----------------------|-------------------------|---------------|--------------------|--------------------|--------------------|
| | 1260 Housing Development Corporation, | | | | | | |
| 2537 S. 7th St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | duplex | N/A | Low Income | PBA S8 | 2 | 1 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 11901-13 Academy Rd., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | PBA S8 | 40 | 1, 2 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 714-718 Rhawn St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | PBA S8 | 55 | 1, 2 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 4424-30 Wingate St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | PBA S8 | 33 | 1, 2 BR |
| Keystone HDC | Keystone HDC, 2042-48 Arch St., | 0 | Moderate | | | | , |
| 6300 Keystone St., Philadelphia, PA | Philadelphia, PA | garden | | Low Income | HUD 811 | 11 | 1 BR |
| | 1260 Housing Development Corporation, | 8 | Substantial | | | | |
| 245 S. 46th St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | | Low Income | PBA S8 | 4 | 0, 1, 2 BR |
| 4th Street Access | Fourth St. Access, LP, 2042-48 Arch St., | Burgen | New | | 121120 | | o, 1, 2 Dit |
| 1912-30 N. 4th St. Philadelphia, PA | Philadelphia, PA | rowhome | | Low Income | PBA S8 | 24 | 1 BR |
| | 1260 Housing Development Corporation, | Townonie | construction | Low meome | 10/100 | 21 | 1 DK |
| 519-23 Martin St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | PBA S8 | 15 | 1, 2 BR |
| 517-25 Wattin St., I madeipina, I A | 1260 Housing Development Corporation, | garden | Substantial | Li and Warket | I DA 50 | 15 | 1, 2 DK |
| 410 S. 9th St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | mid-rise | | Low Income | PBA S8 | 3 | 1, 2 BR |
| 410 S. 9th St., Filladelpilla, FA | 1260 Housing Development Corporation, | IIIIu-IISe | Substantial | Low income | FDA 30 | 5 | 1, 2 DK |
| 917 Lombard St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | mid-rise | Rehab | Low Income | PBA S8 | 4 | 0 1 2 PD |
| 917 Lonibard St., Philadelphia, PA | 2042-48 Alch St., Philadelphia, PA | IIIId-IIse | Kellab | Low income | FDA 30 | 4 | 0, 1, 2 BR |
| Walaut/Thomason I.D. | Walnut Thomason, J.D. 2042, 48 Auch St | | | | | | |
| Walnut/Thompson LP | Walnut Thompson, LP, 2042-48 Arch St., | 1 · 1 · | DIIAI | т т | | 25 | 1 DD |
| 1324 Walnut St. & 4230 W. Thompson St., Philadelphia, PA | Philadelphia, PA | high rise | | Low Income | PBA S8 | 35 | 1 BR |
| | 1260 Housing Development Corporation, | | Moderate | | | 1.6 | 1.0.00 |
| 4537-39 Osage Ave., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | Rehab | LI and Market | PBA S8 | 16 | 1, 2 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 2939-50 Benner St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | PBA S8 | 22 | 1 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 6100 Frankford Ave. | 2042-48 Arch St., Philadelphia, PA | garden | | LI and Market | PBA S8 | 11 | 1, 2 BR |
| | 1260 Housing Development Corporation, | | Moderate | | | | |
| 4501 Larchwood Ave., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | | LI and Market | PBA S8 | 15 | 1, 2 BR |
| | 1260 Housing Development Corporation, | | Moderate | | | | |
| 222 McKean St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | triplex | Rehab | Low Income | PBA S8 | 3 | 1 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 1437 S. 6th St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | Low Income | PBA S8 | 4 | 1, 2 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 5317 N. 15th St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | single | N/A | Low Income | PBA S8 | 1 | 3 BR |
| | 1260 Housing Development Corporation, | | Moderate | | | | |
| 3852-54 Spring Garden St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | duplex | Rehab | Low Income | None | 2 | 3 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 4411 Sheffield Ave., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | PBA S8 | 11 | 1 BR |
| | 1260 Housing Development Corporation, | ľ | | | | | |
| 5335 Wayne Ave., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | triplex | N/A | Low Income | None | 3 | 1, 2 BR |
| | 1260 Housing Development Corporation, | | | | | | , |
| 714 Ritner St. Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | duplex | N/A | Low Income | PBA S8 | 2 | 1 BR |
| | | aupier | | 2.5 in meonie | 1 511 50 | 1- | 1. 2. |

| | | Type of | Type of | | Subsidy | Number of | |
|---------------------------------------|---------------------------------------|------------|--------------|---------------|---------|-----------|---------------|
| Name and Address of Development | Name and Address of Owner | Structures | Construction | Income Mix | Program | Units | Size of Units |
| | 1260 Housing Development Corporation, | | | | | | |
| 4401 Sheffield Ave., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | None | 11 | 1 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 7092 Forrest Ave., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | garden | N/A | LI and Market | None | 12 | 1 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 720 Ritner St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | single | N/A | Low Income | PBA S8 | 1 | 3 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 2021 S. 3rd St. Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | duplex | N/A | Low Income | PBA S8 | 2 | 1 BR |
| | 1260 Housing Development Corporation, | | | | | | |
| 1339 S. 4th St., Philadelphia, PA | 2042-48 Arch St., Philadelphia, PA | triplex | N/A | Low Income | PBA S8 | 3 | 1 BR |

COLUMBUS PROPERTY MANAGEMENT & DEVELOPMENT, INC. (CPM) Agent for

_____ (Owner)

Management Plan

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INTRODUCTION

This Management Plan seeks to describe/define the procedures of Columbus Property Management & Development, Inc. ("Agent") in providing property management services (pursuant to a property management agreement ("Management Agreement")) to the ______project ("Project"), a __ unit project owned by ______, L.P., a Pennsylvania limited partnership ("Owner") located at the address below in ______, Pennsylvania.

Address:

Type of Construction:

PROPERTY DESCRIPTION

______, the [new construction/rehabilitation] of _____affordable [townhome] units, [includes one rent free unit for an on-site property manager/resident service coordinator]. The development consists of _____buildings, [clustered into 8 structures], with ____ one bedroom units, _____two bedroom units, and _____three bedroom units, and community space. The project will include _____accessible units for residents with mobility and/or hearing or visual impairments; [integration of a geothermal heating/cooling system to help reduce energy bills]; [and on-site service coordinator to work with tenants and assist in making connections to local agencies for services].

MANAGEMENT COMPANY ORGANIZATION

CPM is organized as reflected in the attached organizational chart (<u>see</u> attached Exhibit I). The key contact for CPM is Alfredo de la Pena (Executive Director) (215-557-8484 x3223). The Senior Director of Property Management is Heidi Bohn (x3245). There will be a single property manager, reporting to the Senior Director, dedicated to the above-referenced property. [That staff person will be on-site and will also serve as the resident services coordinator]. The Director of Compliance is Clare Oestreicher (x3208). It is acknowledged that personnel may change. In such instance CPM will attempt to update/revise this Management Plan to reflect the most current personnel / staffing.

CPM will allocate maintenance, administrative and compliance staff for the Project as required.

STAFFING / HIRING PRACTICES

CPM has a staff of 71 employees. CPM staff dedicated to the project will be as set forth in the Management Company Organization paragraphs. All hiring and employment practices at CPM are in conformance with applicable equal opportunity requirements of local, state, and federal laws and Section 3 of the U.S. Department of Housing and Urban Development Act of 1968, as amended.

ACCOUNTING

CPM performs all accounting functions on an accrual basis using YARDI. The system includes a general ledger, accounts payable, accounts receivable, check register, details of each property and

tenant information. YARDI provides a substantial amount of accounting, financial and property management reports.

ANNUAL BUDGETS

Detailed budgets are prepared for each property under the supervision of CPM's Executive Director. Budgets are prepared by a team comprised of: the Executive Director, the Chief Financial Officer (CFO), the Real Estate Asset and Portfolio Manager, the Senior Director of Property Management and other employees of CPM.

MARKETING PROCEDURES

[Wyalusing Meadows is located in Wyalusing Borough in rural Bradford County, along Pennsylvania's border with New York State. The Borough of Wyalusing is home to only 225 households, while the Census Tract in which Wyalusing Meadows is located is home to over 1,100 households, as it expands into more municipalities in the County. According to the Federal Financial Institutions Examination Council, the tract is home to a middle income level, with an estimated median family income of \$55,600 in 2012. Census Tract 9511 has a slightly lower rate of families and people living below the poverty line than Bradford County as a whole, 8.3 percent compared to 9.7 percent. The overall unemployment rate in the County of 3.5 percent is much lower than the Commonwealth average of 7.4 percent.]

An annual evaluation of marketing efforts will be completed to ensure that efforts are effective in reaching those individuals least likely to apply. The [site] manager will at a minimum, annually place calls to all places of outreach to those persons listed as contacts for each advocacy group listed within this plan. The contact will ensure that the information is reaching those individuals with which it is meant to reach and also ensure that the project is maintaining contact with the correct individual who will see that the information is dispersed to those individuals least likely to apply.

The [site] manager will compare the census tract information as well as the housing market area and expanded housing market area information with those persons currently residing at the property. In the event that there are race and/or ethnic groups which appear to be below those of the housing market area additional outreach efforts will be made i.e. more frequent attempts at outreach for the particular group or more advocacy/groups for the particular group will be sought out.

The [site] manager will outreach to those persons/groups listed within this plan as stated. However, the [site] manager will also, during the normal course of business come across new links/contacts and will increase outreach efforts by maintaining contact and relaying application information.

OCCUPANCY REQUIREMENTS/TENANT SELECTION PLAN

All residents must meet project eligibility requirements of the particular funding sources for those units/building as well as pursuant to those policies and procedures set forth in the CPM Tenant Selection Plan (see attached Exhibit II). In order to ensure that all occupants of the project meet

these eligibility requirements, the compliance department at CPM works with the leasing/property management department to routinely review all prospective and current tenants at the project. In addition to CPM screening and selection requirements, the requirements of the Philadelphia Housing Authority with regard to Project-Based Assistance must be met. Both the property management and compliance departments will review the applications to ensure that prospective tenants meet all of the eligibility requirements.

RENT COLLECTION AND EVICTION POLICIES AND PROCEDURES

Resident rents are collected and posted in YARDI (property management software – web based). Rents are posted by the accounts receivable coordinator and deposited into Owner's operating account. A rent roll indicating rent and subsidy charges to and receipts from tenants is produced monthly by the office. To ensure timely collection of rent, delinquency reports are compiled by property managers and the Director of Property Management monitors to insure timely collection. Rents are due and payable in advance on the first of each month. Rent is accepted at the office or via mail.

Tenants who do not comply with the terms of their lease, including the timely payment of rent, will be sent a notification by the property manager outlining the violation(s) and requesting correction and compliance. Residents who do not comply with the notification to come into compliance with their lease are requested to vacate the unit; if they do not willingly vacate, CPM will file for eviction.

Once a decision has been made to evict a tenant, the property manager will write a letter to the resident informing the resident to vacate the unit within the amount of time delineated in the lease. The request to vacate letter outlines the reasons for the request to vacate. The letter is approved by the Senior Director of Property Management and a copy is forwarded to all applicable parties. The property manager then performs the following tasks:

- Complete and give to applicable personnel a Move-Out/Transfer Notice.
- Complete an Eviction Form and process a purchase requisition for the charges for a complete eviction process.
- Notify in writing the applicable personnel to give payments, e.g. rental, to the property manager.
- Notify the rent subsidy program (PHA-Section 8, Supported Independent Living, Shelter Plus Care, etc.)

At the end of the move-out period, the property manager also checks to determine if the tenant has moved out of the unit. If the resident has not moved from the unit, or come into compliance with the lease, the property manager will implement legal eviction.

Upon issuance of the date and time of the eviction, the property manager will:

- Schedule maintenance personnel or a locksmith for the appointed time to change the locks.
- Schedule maintenance or furniture movers to remove the tenants' belongings from the unit.

On the day prior to the eviction, the property manager confirms the appointment with all of the staff indicated above. The property manager is present at all evictions and performs a move-out inspection and compares it to the move-in checklist. The property manager then notifies maintenance of the need to turn over the unit, of damages and/or unusual repairs. The manager also notifies designated staff who arranges to have the utilities transferred into the entity's name and notifies the rent subsidy program of the eviction. A letter is sent to the ex-tenant within thirty days to return any security and to notify the resident of any deductions from the security for damages, unpaid rent, etc.

GRIEVANCES AND DISPUTES

Complaints and concerns from residents are dealt with promptly. All resident concerns are addressed by the property manager directly. Any issues that cannot be resolved by the property manager will be referred to the Senior Director of Property Management.

MAINTENANCE PROCEDURES

A. Maintenance Department

The Senior Director of Property Management for CPM oversees a maintenance staff of 16 full time employees (see attached Exhibit I).

B. Types of Maintenance

1. Routine

Routine maintenance includes non-emergency repairs, scheduled and preventive work orders, turnovers, and inspections.

2. Preventive

Preventive maintenance is scheduled maintenance that extends the life of the building.

3. Emergency

Emergency maintenance is maintenance work that must be performed immediately.

C. Response to maintenance calls

Tenants are instructed (via tenant handbook – provided with the lease) to call the CPM maintenance department for all maintenance related calls. Such calls received during work hours, (8:00 AM through 4:00 PM) are routed through the CPM maintenance office. When a tenant reports a maintenance request maintenance personnel verify the name and address and seeks to determine the exact nature of the request. The request is then logged into the maintenance module of the YARDI database at which time it becomes a work order.

All calls received during off-hours and weekends are received and logged by a live answering service. After receiving the call, the answer service then contacts the CPM maintenance personnel that is on-call during that time. After receiving the call from the answering service, such personnel contacts the tenant to confirm the request and determine the next steps. All calls that are determined to be an emergency are handled on an immediate-ASAP basis. All calls that are determined to be routine maintenance calls are handled in the order that they are received, factoring in the nature and severity of the problem.

All CPM maintenance personnel are provided with cell phones to ensure immediate communication. All messages are returned.

D. Work Performed by Staff/Contract

Work that is routinely performed by outside contractors includes, but is not limited to: trash removal; hallway and common area cleaning; landscaping; snow removal; fire safety inspections; patching/painting repairs; major structural repairs; roof repairs; electrical repairs; unit preparation; intercom repairs; and so forth.

Work that is routinely handled by staff includes: routine hallway and common area cleaning; bulk trash removal; work order resolution; (major/minor heating, electrical and plumbing problems; locks and other minor repairs); carpentry repairs, window/screen replacements; and so forth.

E. Work Orders

When a tenant calls reporting a maintenance request, the request is repeated to the tenant in order to assure the problem is accurately recorded. The request is logged into the Maintenance module of the Yardi Database as a work order. If it is an emergency, the maintenance personnel are advised immediately and appropriate action is taken. On a daily basis the work orders are prioritized according to their type and are assigned to maintenance personnel.

At completion of an open work order request the maintenance employee returns the completed work order to the office where it is either closed or processed to bill the tenant for tenant damages. A determination if the work performed is billable to the tenant (tenant damage) is made at the time of the repair by the maintenance technician. Work orders related to normal "wear & tear" (physical depreciation) are not billable but tenant damages are. At the end of each month the maintenance department generates itemized invoices that are sent directly to the tenants, with a copy sent to the property management department.

F. Apartment Turnover

When a unit becomes vacant it is inspected for damages charged to the prior tenant and evaluated detailing the type and cost of work needed to turn the unit over in preparation of the next tenant. Turnover Staff schedules and coordinates various contractors necessary to complete the repairs. All turnover activity is kept in a report called "Hot-list" which depicts which properties are in the process of being turned over and what is the expected completion date. This report is updated weekly.

G. Inspections

1. Loss Control/Safety Inspections

CPM is responsible for protecting the properties that it manages for its residents. It is essential that the properties are constantly monitored for potential threats to the physical property and to ensure the safety and well being of the residents. Properties are inspected

on a regular basis for hazardous conditions by both the maintenance and property management teams.

2. Apartment Inspections

Move-In Inspection

A move-in inspection of the unit is performed by the turnover staff and property management staff in conjunction with the tenant prior to the initial lease date. All items and existing conditions are noted on the "Move- In Report" and the report is signed by both the property manager and the resident. The report is kept in the tenant's file. Some units are subject to initial inspection depending on Local, State or Federal subsidy guidelines.

Annual Unit Inspection

Every unit is inspected for damages or repairs at least once per year during an annual inspection. For units with Section 8 tenants, these inspections are usually performed along with the Section 8 recertification inspection done every year. All repairs are reported to the maintenance department. In addition, CPM contracts with an extermination company who visits every unit in the portfolio once per month (or in some case once every other month), at which time the extermination tech inspects the unit for any life safety issues or other potential hazards and sends a report to the maintenance office.

Move-Out Inspection

When a resident gives notice that they are vacating the unit, the Turnover Specialist will make an appointment to conduct a move-out inspection. Using the move-in data as well as any data from the annual inspections, the Turnover Specialist will determine what, if any, damages beyond normal wear and tear have occurred and will be charged against his/her security deposit.

Property Inspection

All properties are inspected by various departments of CPM on a regular basis. Approximately one time per month, the CPM contracted exterminator visits all properties and units to apply extermination treatment, at which time such person inspects the property for life/safety issues and any potential hazards and reports any findings to the maintenance department for action in accordance with maintenance procedures.

The CPM Senior Director of Property Management as well as its Executive Officer both perform regular spot visits to the CPM managed portfolio and report any findings (repairs, preventive maintenance, life/safety issues) to the maintenance department for action in accordance with maintenance procedures.

CPM property management and/or maintenance staff accompanies third party funding sources (including Section 8) to visit properties which receive such funding. Depending on the funding source, this is usually done on an annual basis. Any maintenance issues reported by such funding sources are communicated to the maintenance staff for action in accordance with maintenance procedures.

H. Extermination

When a property is initially occupied, CPM puts into place a program of monthly evaluation and treatment by a licensed exterminator. Based on the results of the evaluation, an extermination plan is developed to prevent any infestation. Special infestation situations arise and are treated as emergencies. Emergencies receive the immediate attention of the exterminator who will develop a treatment plan with the tenant. Tenants are always informed ahead of time when extermination evaluations or treatments will be performed in their building and units.

PURCHASING POLICIES AND PROCEDURES

1. Routine Purchasing

Approval: Approval of all routine purchases is the responsibility of the Senior Director of Property Management. Said Director is authorized to approve purchases of supplies and services up to \$5,000 (unless limited further by the Property Management Agreement). The maintenance staff at the supervisory are authorized to approve purchases up to \$2,000 with prior approval of the Director of Asset Management. Approval of non-routine purchases above \$5,000 must be obtained from CPM's Executive Director.

Purchase Orders: Purchase orders are used for purchases of all supplies and services. Purchase orders originate from the maintenance office, created in Yardi and are given to vendors/contractors along with the assignment of work. The purchase order is matched to the invoice upon receipt of the invoice and then processed for payment through the Accounting Department.

A. Bid and Contract Process

Three bids are secured for all contracts, services and large purchases which are equal or more than \$5,000. After the bid is awarded, an Agreement is executed between CPM and the contractor outlining insurance requirements for any contract of services. No contractor will be hired who cannot provide proof of insurance.

Purchasing Supplies or Equipment

All purchases of supplies and equipment include the following in a contractor bid:

- Detailed description of goods to be provided;
- Detailed list of all items being purchased, with shipping and delivery costs listed separately;
- Cost of any installation, including modifications required;
- Warranties;
- Deadlines for receipt of quotation;
- Method and terms of payment, including any discounts;
- Any alternative bid;
- Availability and delivery date.

Bid specifications should include information regarding size, color, special features, delivery sites, need for staff to be present, removal and discarding, etc.

Contracts for Services

Bids and contracts for services are very specific in defining the scope of work:

- Dates of commencement and completion;
- Products to be used;
- Any special equipment necessary;
- Permits and/or special licenses required and who will secure them;
- Levels of required insurance.

B. Insurance Requirements

Policy

It is CPM's policy that all contractors with whom CPM contracts should have sufficient insurance to minimize Owner and CPM's exposure from claims arising from the contractor's performance. This objective is accomplished by:

Establishing minimum limits of general liability, automobile, and worker's compensation insurance;

Requiring certificates of insurance be on file with CPM prior to entering into a contract; Requiring that all contractors sign an agreement which holds Owner and CPM harmless from any injury or damage resulting from the contractor's actions;

Established an internal CPM supervisory review process for all contracts;

Implementation of a procedure that ensures that all certificates of insurance are updated annually.

General Procedure

CPM requires that all contractors with whom it does business carry liability insurance. The following are the required levels of liability insurance to be carried by each contractor:

- \$1,000,000 per occurrence for general liability; \$2 million aggregate;
- \$1,000,000 automobile;
- \$1,000,000 for products/completed operations aggregate;
- \$2,000,000 general policy aggregate.

CPM further requires that contractors carry automobile liability insurance for all owned, leased, non-owned and hired vehicles with a minimum liability limit of \$1,000,000 per accident, combined single limit for bodily injury and property damage. The policy will also include auto contractual liability coverage.

CPM also required that contractors with employees maintain in full force and effect worker's compensation insurance providing statutory coverage and employer's liability insurance with minimum Statutory limits: \$100,000 each accident, bodily injury by accident; \$100,000 each employee, bodily injury by disease (injuries which are the result of a disease contracted by the employee while on the job); \$500,000 policy limit, bodily injury by disease.

Contractors with no employees are not required to have worker's compensation insurance. The clause in the Agreement is written in such a way as to require worker's compensation coverage only when the contractor retains employees.

CPM does not normally require an excess liability ("umbrella") clause which provides coverage over and above the general liability, automobile liability and employer's liability policies described above.

All coverage, with the exception of worker's compensation, must list CPM as additional insured.

The following steps are followed for each contract signed.

- Follow CPM bidding procedure to secure bids for specific work/service.
- Review "limits of insurance" and "hold harmless" clauses with the contractor selected. Resolve any issues which may arise prior to execution of the Agreement.
- Execute the Agreement with the contractor and request certificate of insurance. No work may commence prior to receipt of the insurance information.
- For contracts in the amount of \$5,000 or less; which do not involve structural changes; which are less than one year; and are not self-renewing:
 - CPM collects a signed Agreement and certificate of insurance from the contractor;
 - the limits of insurance are reviewed to ascertain they meet the required limits;
 - the Agreement is executed, and one copy is kept on file in the office and the other is provided to the contractor.
- For contracts in excess of \$5,000; and/or involve structural changes; and/or which are for more than one year; and/or which are self-renewing:
 - the same steps are followed as listed above;
 - $\circ\;$ the Agreement is forwarded to the Executive Director for review and signature.

Updating of certificates of insurance is performed annually each June by the accounting department. Agreements and current Certificates of Insurance are on file.

RESPONSE TO RESIDENT REQUESTS

CPM has a strong commitment to providing residents with timely, appropriate responses to their maintenance requests. Tenants are provided at move-in with a phone number to call to when they have a maintenance problem. The phone is monitored during office hours by office staff and by an answering service at night and on weekends.

Routine and After Hours Maintenance Requests

CPM tries to maintain effective communication with residents. Each resident is instructed that requests for repair work must be made through the office. A written record of all calls is made on a work order when a maintenance staff member enters them into the system. All completed work orders are kept on file. Every effort is made to respond to routine requests within one week. During working hours (8:30 AM through 4:00 PM) maintenance calls are routed through the maintenance office. For emergency maintenance purposes, CPM has two maintenance personnel on-call to provide maximum emergency coverage to all areas of the city. Through a staff rotating system, maintenance employees are on-call during off-hours and weekends. Maintenance calls are received by the answering service who in turn calls the maintenance on-call supervisor who in turn calls back the tenant and makes a determination if maintenance personnel or a contractor should be dispatched to the emergency. Regardless of the type of maintenance call, the tenant always receives a return phone call from staff.

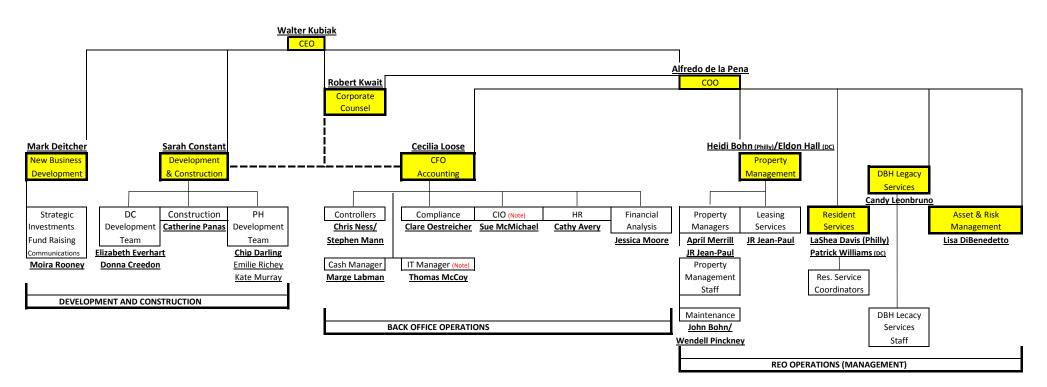


EXHIBIT II TENANT SELECTION PLAN Columbus Property Management & Development, Inc. Properties

GENERAL OVERVIEW AND OBJECTIVES

The tenant selection/rejection criteria and, more generally, the Management Plan to which this addendum is attached, outlines the procedures and criteria by which management will conduct the rental process and select/reject tenants for occupancy in projects for Columbus Property Management & Development, Inc. and Development. This policy will be made available to HUD, Pennsylvania Housing Finance Agency, City and County funding sources, public housing authorities, as well as staff and applicants. This plan is in two parts. Part I is the general screening criteria for all developments managed by Columbus Property Management & Development, Inc. and Part II highlights specific requirements of the HUD programs in operation at one or more developments, based on their specific required admission restrictions.

Part I

In Part I, all rules and procedures will be carried out in accordance with the most current revision of HUD Handbook 4350.3, LIHTC Section 42 and directives from the Pennsylvania Housing Finance Agency (PHFA), public housing authority Policy and Local funding institutions. Applicants for assistance must meet the screening criteria identified in Part I and must qualify under the following eligibility factors. All eligibility factors must be met to be accepted as a resident of Columbus Property Management & Development, Inc. and Development

1. FAIR HOUSING AND EQUAL OPPORTUNITY

No discrimination will be permitted in the selection of applicants on the basis of race, color, religion, sex, national origin, disability, familial status, sexual orientation or age. Applicant must meet the program requirements regardless of their protected class designation to be eligible for occupancy. Special effort will be made to assure all local and state Fair Housing Protected Classes will not be discriminated against.

Columbus Property Management & Development, Inc. will be in compliance with all Federal and local Fair Housing and equal opportunity requirements. Management will document the local and state ordinances to assure compliance.

As noted within this plan, Columbus Property Management & Development, Inc. will complete the HUD Affirmative Fair Housing Marketing Plan HUD Form 935.2 for each development that receives federal funding and amend this plan every 5 years to assure that the marketing is current and marketing methods are relevant and will meet those least likely to apply.

2. SECTION 504

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination against persons with disabilities and establishes accessibility requirements in federally funded housing programs. Section 504 establishes definitions for "person with disabilities" and "disability" that differ from

the definitions established in multifamily subsidized housing program regulations for purposes of determining program eligibility.

A person who meets the definition of a person with disabilities as defined for civil rights protections may or may not meet the definition of a person with disabilities as defined for program eligibility purposes. All admissions, policies and procedures will be in compliance with HUD's Handbook 4350.3 regulations.

Columbus Property Management & Development, Inc. will make every effort to identify the developments with direct HUD assistance which requires a proactive role in Protections under Section 504 of the Rehabilitation Act of 1973. Should a development not have any HUD assistance in its composition, the staff is aware of the applicable Fair Housing Act Policy to be implemented.

Should an existing tenant request reasonable accommodations during occupancy, management will address this request by:

- Requesting the accommodation in writing as indicated below. If the tenant is unable to provide the request in writing, management will complete the request on behalf of the tenant with the tenant signing the request.
- Should there be a sponsoring agency involved at the development, they will be included in this determination and all discussions on the best approach.
- Verify the need for the accommodation and request the care provider identify alternative accommodations
- Meet with the tenant to discuss the best approach to meeting the accommodations.

As an attachment to this Tenant Selection Criteria, the staff will request the applicant complete the form located in Appendix A as the request for reasonable accommodations. Should an applicant or tenant require assistance in completing this form, staff will be available.

In Appendix B there is a request for a Live-in Aide which will be needed for an applicant who may need this assistance as a reasonable accommodation.

Companion Animal policy and appropriate request is included in Appendix C

3. GREIVENCE WITH 504

Columbus Property Management & Development, Inc. 504 Grievances Policy: The staff of Columbus Property Management & Development, Inc. strive to maintain an open line of communications between residents and all staff. It is anticipated there may be occasion when the tenant/applicant prefers to have another opinion about elements necessary for requested modifications as they relate to Section 504. If the staff cannot meet an amicable solution, the tenant/applicant may request a meeting with entitles who were not initially involved in the modification.

The policy is as follows:

1. The tenant/applicant who is dissatisfied with the determination or action by the management

staff may opt to seek relief by presenting a written statement to the Property Manager or the designee requesting an informal hearing.

2. If the tenant/applicant has concerns, which cannot be resolved through an informal hearing they may have a final recourse to present their grievance to the owner.

3. The hearing discussions and determination rendered by the Property Manger and/or the owner shall be sent to the aggrieved tenant in writing, with a copy being maintained in the tenant/applicants file.

4. The results of this hearing will be provided in writing to the tenant/applicant with all supporting documentation that has been collected to render this decision.

4. STUDENT ELIGIBILITY

Student Eligibility for Section 8 assisted tenants

A student enrolled in an Institute of Higher Education, as defined by the Higher Education Act of 1965-Amended 1998, will be deemed eligible for assistance if the student meets all other eligibility requirements, passes screening criteria and is:

- 1) Living with parents/guardian, or
- 2) Over 23 years of age, or
- 3) A veteran, or
- 4) Married, or
- 5) Has a dependent child, or
- 6) Can prove independence of parents including providing certification that the parents did not claim the student on the most recent tax return, or
- 7) Has parents who are income eligible for the Section 8 program, or
- 8) Is a person with disabilities, as such term is defined in section 3(b) (3) (E) of the United States Housing Act of 1937 (42 U.S.C.1437a (b) (3) (E)) and was receiving assistance under Section 8 as of November 30, 2005.

Any financial assistance, in excess of amounts received for tuition, that an individual receives under the Higher Education Act of 1965 from private sources or an institution of higher education (as defined under the Higher Education Act of 1965) shall be considered income to that individual. There are two exceptions to this income calculation requirement. No financial assistance that an individual receives under the Higher Education Act of 1965 from private sources or an institution of higher education (as defined under the Higher Education Act of 1965 from private sources or an institution of higher education (as defined under the Higher Education Act of 1965) shall be considered income if the student is:

- 1) Living with his/her parents/guardian or
- 2) A person over the age of 23 with dependent children

Student eligibility under the LIHTC Program

In general, an entire unit comprised of full time students are not LIHTC eligible. The regulation states that "in no case is a unit considered to be occupied by low-income individuals if <u>all</u> of the

occupants are full-time students."

The definition of a full-time student is one who attends school at least 5 months during a year or is taking 12 credit hours per year.

If a household consists entirely of full-time students, it must meet one of the following exceptions in order to qualify for occupancy in a tax credit property:

- Any member of the household is enrolled in a federal, state, or local job training program comparable to the federal Job Training Partnership Act;
- Any member of the household receives assistance under Title IV of the Social Security Act: AFDC, TCA or TANF;
- Every adult member of the household is a single parent, and neither they nor any of their children are dependents of a third party; or
- Every adult member of the household is married and files a joint tax return.

A very important issue is that students are not "grandfathered." If an existing household becomes an ineligible full-time student household, the unit no longer qualifies as a LIHTC unit.

5. APPLICATION INTAKE

All applicants requesting to live in a Columbus Property Management & Development, Inc. Development unit shall complete a pre application form. The application form requires information on all household members that will reside in the unit. It includes names, ages, social security numbers, student status, list of assets disposed of for less than fair market value, all sources of the household's income (which includes assets), rental history and whether or not the applicant is requesting an accessible unit.

When reviewing the application, managers will check for completeness in information or discrepancies. Any discrepancies must be clarified and the applicant's responses documented. Incomplete applications should not be accepted. Managers should never assume that questions on the application left blank means it does not apply to the applicant or its household.

Upon receipt of an application, Columbus Property Management & Development, Inc. will make a preliminary eligibility determination:

- The applicant will be rejected if the household is clearly ineligible.
- The application will be added to the waiting list if it appears eligible.

Columbus Property Management & Development, Inc. must date and time stamp all applications to ensure proper placement on the waiting list. The PM will contact the applicant via written correspondence notifying them of approval or denial and the reasons for denial if applicable.

After management has determined if the applicant qualifies under the properties selection

criteria, the manager should contact the applicant to schedule an appointment to come to the rental office to complete a release of information form and sign third party verifications. Owners must make accommodations for persons having special needs.

Pre-applications will be available to interested parties in person or by mail when requested. The request for a pre-application to be mailed should state the number of applicants, the current address and telephone number. Completed pre-applications may be submitted to the office in person or by mail and will be date and time stamped on the working day received. If returned by mail, the time of the receipt will be 4 P.M. of the working date received. Applications that are not complete or do not have an original signature will be returned within 5 days for further information.

Within 5 days of receipt of the completed pre-application, the staff member in charge of admissions or his/her designee will review the application for apparent program eligibility. No verification will be done until an offer of an apartment is imminent. Notice will be sent to the applicant(s) no later than the end of this 5-day period advising them of the results of this review.

Applicants apparently not program eligible will be notified in writing of their ineligibility. Provision for the appeal process will be spelled out in detail in this notice.

6. PLACEMENT OF APPLICANTS ON THE WAITING LIST

Once an applicant's name is on the project's waiting list, it is the responsibility of the applicant to keep in contact with Columbus Property Management & Development, Inc. as to any changes that would affect the household's eligibility for tenancy or an opportunity to supplement information already provided to Columbus Property Management & Development, Inc.. This communication would be between the staff member in charge of admissions and the applicant. Examples of changes that an applicant needs to report include, but are not limited to, a change of address, a large change in household income, and a change in household composition or size.

The waiting list will be maintained for persons not currently in residence with CPM. Priority will be given to internal transfers of current CPM tenants including requests for reasonable accommodations (i.e. the need for an unit with architecturally altered features for the mobility impaired), or a health or safety issue or occupancy issue.

In determining the maximum income allowable for occupancy, the Section 8 developments managed by Columbus Management fall into two categories:

- Those developments having Housing Assistance Payment Contracts effective prior to October 1, 1981 and may admit applicants with incomes up to the low-income limit.
- Those developments having Housing Assistance Payment Contract effective after October 1, 1981 are restricted to admitting only very low-income applicants.

The HUD Handbook 4350.3 Rev 4 requires that no less than 40% of any project assisted through project-based Section 8 program in any fiscal year must be extremely low income. This income targeting requirement applies to all properties with project-based Section 8 assistance regardless when the HAP contract was originally signed. All pre-1981 and post 1981 universe requirements

still apply. Since HUD does not prescribe a method for complying with this requirement the developments managed by Columbus Property Management & Development, Inc. will follow the following steps to assure the appropriate number of households fall to this category.

The order of placement on the waiting list shall be:

For reasonable accommodations and internal transfers within CPM managed properties, placement shall be chronological by the date that the resident requested the transfer in writing and proper verifications were received. If a tenant makes a request for a transfer in writing, a verification form or sample letter will be made available for the tenant's signature within ten working days. A request for a transfer will circumvent this order only if it is determined that there is an immediate threat to the health or safety of the resident.

After Reasonable Accommodation or internal transfer requests; the preference on the waiting list will be ranked in the following order: 1) public housing authority wait list; 2) veteran referrals; 3) victims of domestic violence; 4) program referrals as defined in executed funding agreements; and 5) new applicants.

In addition the following properties have specific referral connections where applications must be processed from these referrals before the above mentioned preferences.

| PROPERTY NAME | REFERAL SOURCE |
|------------------------|-------------------------------------|
| NE Ditman Associates | Liberty Resources |
| NE Keystone Associates | Liberty Resources |
| Scattered units | Inglis House |
| Pennsgrove | COMHAR |
| Fells Point Station | Housing Authority of Baltimore City |
| Fells Point Station | Innovative Housing Institute |

The following properties have specific funding where applicant eligibility allows for placement on the waiting list to trump the normal preferences:

• Golden Rule Apartments- (a HUD 236 property) applicants displaced by a Government Action or Presidentially declared Disaster will be placed on the top of the waiting list.

The date and time the completed application is received will become the Official Date of Application. If there are not enough applicants on the current waiting list to allow for the prescribed percentages, the procedures as outlined in HUD Handbook 4350.3, would be implemented, including actively marketing to the appropriate income applicants.

If an applicant is on a particular waiting list due to information provided in the preliminary application and the certification process determines that the applicant actually qualifies for a different category, the applicant would then be moved to the bottom of the appropriate category.

Verification will be made of all declared income and assets. Written verification directly from the source is made whenever possible, after written consent of the applicant is obtained. The next

most acceptable source is direct contact with the source, in person or by telephone. Other reliable documentation is accepted if direct contact with the third party is not available, costly to obtain, or delayed beyond two weeks from the initial request.

A second attempt to obtain verification directly from the source will be made.

Arbitrary contact with area banks may be conducted to discourage nondisclosure or to follow up on information indicating the possible presence of additional accounts. All verifications will be conducted in accordance with forms HUD-9887 and 9887A or CPM General Release form. Applicants are allowed to be on three CPM waiting lists. Once they are housed the applicant is removed from the other waiting lists.

7. WAITING LIST MAINTENANCE

Waiting list(s) will be updated at least annually, and will remain open. If an applicant is called in for certification, the contact will suffice as an update. Written notice will be sent to all persons on the list(s) not otherwise contacted, advising them that if they wish to remain on the waiting list, they must respond in writing within 21 days of the date of the notice. Those not responding to the update will be permanently removed from the waiting list.

Persons on the waiting list who refuse to begin the certification process for an offer of an appropriately-sized and equipped unit and have a good cause will remain at their present position on the waiting list. The length of time an applicant can stay at their present position will be handled on a case-by-case basis. If there is such a refusal without a good cause, the applicant will be moved to the bottom of the waiting list and the date of his/her refusal will become the new Official Date of Application. In the event an applicant declines a second time without a good cause, the applicant shall be removed from the waiting list. "Good cause" is defined as a verified medical condition which will temporarily prevent an applicant from moving to a Columbus Property Management & Development, Inc. unit. Those evicted from Columbus Property Management & Development, Inc. and or registered Lifetime Sex Offenders are not allowed to be placed on the waiting list.

8. CLOSING THE WAITING LIST

In the event that Columbus Property Management & Development, Inc. in the management of the application process determines that any specific site has (for one or more unit sizes) enough applicants on the current waiting list where the average wait on the list is excessive (e.g., one year or more) they may close their list.

Public notice of the closing and opening of the list will be done in accordance with the Affirmative Fair Housing Marketing Plan. If this site is affiliated with DHCD, HABC and PHFA, they will be notified of this closing.

9. TENANT SCREENING

Strict standards for selecting residents are key during the admissions process to insure quality of life and a safe environment for properties managed by Columbus Property Management & Development, Inc.. Staff will verify information furnished by each applicant in a manner which

is timely to processing requirements.

The following screening standards and methods will be applied to all adult members of each applicant household and will be employed fairly and consistently in order to determine suitability for occupancy in a development managed by Columbus Property Management & Development, Inc..

Selection Standard

The applicant demonstrates good rent paying habits with no more than two payments per year having been made after a grace period, and no legal actions begun for non-payment of rent. If any legal actions have been initiated, there must be evidence that the case has been dropped, the filing was in error, or the back rent was paid without further legal intervention.

Screening Method

Rental search. A review of tenant/landlord <u>court history</u>, including writs, evictions and judgments.

Selection Standard

The applicant demonstrates the ability to maintain a good credit history. Impending financial collapse or bankruptcy jeopardizes the tenant's ability to maintain rental payments and may cause Columbus Property Management & Development, Inc. to be included in adverse legal proceeding

Screening Method

Conduct a credit report.

For credit reports, an applicant will be rejected who has a report indicating a pattern of '03' or worse ratings (indicating that they take longer than 60 days to pay). A single rating of '06' or greater (takes more than 150 days to pay) will be unacceptable unless there are extenuating circumstances or we receive a letter from the creditor clearing the account. Ratings will be considered current and applicable if the activity took place within the three (3) years prior to the completion of the certification. In the case of a bankruptcy, a 'Discharge Letter' must be presented to show that the bankruptcy has been settled, that the discharge was three or more years in the past, and current credit ratings must satisfy the conditions for credit reports. If there are no results on a credit report, Columbus Property Management & Development, Inc. may run a social search to verify the likelihood that the name and social security number are legitimate.

Selection Standard

The applicant demonstrates an ability to practice good housekeeping habits with no history of property damage or abuse.

Screening Method

Landlord references from the <u>current and previous landlord(s)</u> covering a period of at least the past three years. In the absence of a landlord reference, a reference from another source of the owner's choosing who would be able to comment on the applicant's housekeeping and unit care or a home visit.

Selection Standard

The Applicant has <u>no history of committing fraud</u> in any HUD rental assistance program.

Screening Method

Current and previous landlord references. HUD-approved on-line search.

Selection Standard

The applicant demonstrates an <u>ability and willingness to live peacefully</u> with neighbors, respecting their rights to a safe and secure living environment and quiet enjoyment of the premises

Screening Method

<u>Landlord reference(s)</u> covering a period of at least the last three years; or, <u>Reference(s)</u> from other responsible parties who would be able to comment on the applicant's conduct and behavior.

Selection Standard

Adult applicants have <u>no pattern of engaging in criminal activity</u> and no conviction record for a felony or for a lesser charge determined by the owner to be indicative of conduct which would represent a threat to the health or safety of tenants or the livability of the property.

Screening Method

<u>Photo I.D.</u> confirming name, Social Security number, birth date, and address of each adult applicant. <u>Police records</u>. <u>Registry check</u> verifying drug-related criminal activity, violent criminal activity, and other sexual offenses. Megan's law webpage.

If there is no credit history of any kind, the applicant will be allowed to proceed with the certification process.

Columbus Property Management & Development, Inc. will deny admission to the household if:

- Any household member has been evicted from Federally-assisted housing for drugrelated criminal activity, for three years from the date of eviction. (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, Columbus Property Management & Development, Inc. <u>may</u> admit the household).
- Any household member is currently engaging in illegal drug use.
- Columbus Property Management & Development, Inc. determines that there is reasonable cause to believe that a household member's illegal use or a pattern of illegal use of a drug may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents. (Examples of evidence of illegal activities may include a conviction record, former landlord references, etc.)
- Any member of the household is subject to a lifetime registration requirement under a state sex offender registration program. During the admissions screening process,

Columbus Property Management & Development, Inc. will perform necessary <u>criminal</u> history background checks in Pennsylvania, Washington DC, Maryland, Delaware and in other states where the household members are known to have resided.

• Columbus Property Management & Development, Inc. determines that there is reasonable cause to believe that a household member's abuse or pattern of abuse of alcohol interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents, based on the household member's behavior.

Columbus Property Management & Development, Inc. will prohibit admission of a household with a household member who is currently engaging in, or, during a reasonable time before the admission decision, has engaged in:

- Drug-related criminal activity;
- Violent criminal activity;
- Other sexual offenses;
- Arson (unless specific to the program eligibility);
- Other criminal activity that would threaten the health safety, or right to peaceful enjoyment of the premises by other residents; or
- Other criminal activity that would threaten the health or safety of any employee, of Columbus Property Management & Development, Inc., contractor, subcontractor or agent of Columbus Property Management & Development, Inc. who is involved in the housing operations.
- Other criminal activity that would threaten the livability or financial stability of the project.

If it is determined that a reasonable time has elapsed since the end of probation or incarceration resulting from the last incidence of such behavior, the applicant must verify that the activity is no longer taking place by:

- Completing a certification that states that she or he is not currently engaged in such criminal activity and has not engaged in such criminal activity during the specified period; and
- Supporting information from such sources as a probation officer, a landlord, neighbors, social service agency workers or criminal records that were verified by Columbus Property Management & Development, Inc..

The exception to the above shall be conviction of a first (1st) degree felony or its equivalent under Pennsylvania, Washington DC, Delaware and Maryland law. Any such felony or equivalent shall be basis for admission prohibition at the discretion of Columbus Property Management & Development, Inc.

Admission will also be denied when there is a substantial risk that:

- The applicant would be unable or unwilling to comply with the requirements of a lease agreement;
- The applicant would be unable or unwilling to pay rent in a timely manner;
- The habits and practices of the applicant or those under the applicant's control will interfere with the health, safety, security, or the right of others to the peaceful enjoyment of the resident community; or
- There would be intentional damage or destruction to the unit or surrounding premises by the applicant or those under the applicant's control.

10. APPEAL PROCESS

- 1. If it is determined that an applicant is ineligible because of not meeting one or more of the tenant selection criteria set forth in this plan, the applicant will be notified in writing of that determination. The notice will explain why the applicant is not being admitted to the project and advise the applicant that he/she may (within 21 days of the date of the notice) respond in writing or request to meet with management to discuss the notice. The meeting or the review of the applicant's written response will be conducted by a member of the management agent's staff who did not participate in the initial decision to reject the applicant. The staff member(s) who rejected the applicant may be invited to the meeting.
- 2. If the applicant responds and after a meeting is held, the applicant will be advised in writing within five working days of the date the meeting was held whether or not the decision has changed.
- 3. The application, the notice of non-acceptance, any applicant's reply, and the final response will be maintained for a period of not less than three years. The file will also contain all interview and verified information on which the determination of ineligibility was based. The file will be maintained in a manner that respects the applicant's right to privacy.
- 4. It can occur, that a decision to reject is overturned if management determines that the applicant has provided enough information to overturn the initial decision.

11. ADDING HOUSEHOLD MEMEBERS

In accordance with the residential lease agreement and in instances of housing assistance contracts, it is a requirement of the tenant to notify management of their request to add additional household members to the unit. This request must be in writing.

When the request is received by management, the adult members will need to sign all appropriate release forms for management to complete screening on the applicant. Each adult will need to

meet the screening criteria for the development that is in place at their time of request. If the adult does not pass the screening criteria they will be notified in writing, as a new applicant will and as described in that section of this plan.

If the proposed additional adult passes the criteria, management will verify all income and assets of this member. That income and assets will be included in a new tenant income certification or HUD Form 50059 depending on the development they are moving into.

The household composition will also be compared to the occupancy standards and a new member denied if the addition exceeds the occupancy limits and an appropriate sized unit is not available to transfer to.

If this is a low income housing tax credit (LIHTC) development, PHFA requires the new household member be certified as eligible at the time of occupancy. If they are, they can remain as a remaining household member and continue to qualify the unit. If not, they can still occupy but follow the LIHTC rules for over income households if necessary.

12. UNIT TRANSFERS

Unit transfers will be allowed in accordance with the rules and regulations set forth in the HUD Handbook 4350.3. The resident must submit a written request. Considerations for unit transfers include requests based on medical needs and/or reasonable accommodations. Unit transfers for Columbus Property Management & Development, Inc. will be based on family size and composition; good standing with Management, efficiency apartment maximum occupancy is 1 person and one bedroom maximum is 2 persons. If someone's request for a different unit is denied, they will be sent a letter within seven (7) days after the date of the verification. If no verification is required, they will be notified within seven (7) days of the date of their letter.

If a unit transfer is granted, the tenant will have three (3) days in which to move once an unit is available. If the move is not completed within the three (3) days, each day after that will be prorated at the market rent in the apartment that is being vacated.

In a LIHTC unit, the Internal Revenue Service (IRS) clarified its position on the handling of unit transfer when it published the final Available Unit Rule on September 26, 1997. Prior to this publication of the rule, IRS considered all unit transfers a ""move-out" and a ""move-in." The transferring resident had to again go through the initial qualification process. If the household income had increased beyond the current qualifying income limit, the household could not transfer.

The final Available Unit Rule now allows transfers to take place in the same building. If an overincome household transfers between units in the <u>same</u> building, the over-income household status will transfer with the household to the new unit.

If Columbus Property Management & Development, Inc. permits a resident to transfer between different buildings where there is usually a different BIN number, Columbus Property Management & Development, Inc. must re-qualify the household and must consider the move as a new move-in.

13. ACCESSIBLE UNITS

In-house residents have preference for accessible units and the move will be at management's expense as a reasonable accommodation. If there are no requests from in-house residents, then applicants are taken from the waiting list in chronological order. Verification will be sent to the health care provider to verify what features the applicant needs. If the needs of the applicant(s) are visible, no verification has to be made. If the disability is visible, but there is doubt as to the staff member's ability to accurately assess the needs, verification will be made.

If there are no applicants on the waiting list and no unit transfer requests for the available accessible unit, the next person, from the appropriate income category, can be moved into the accessible unit. The person will be required to sign an attachment to the lease stating that they will agree to move if we receive a request from someone requiring the accessible unit. When such a request is approved and an appropriate size unit is available, the current tenant will be given a 30-day notice. The tenant will be required to move, at the Owner's expense, by the end of the 30 days.

The tenant will receive notification of eviction proceedings if the tenant refuses to move to the available unit.

14. SECURITY DEPOSIT

At move-in in Section 8 developments, the applicant must pay a security deposit equal to the greater of one month's rent, (the TTP, total tenant payment on the 50059), or \$50.00. The security deposit must be paid at lease signing.

The amount of security deposit established at move-in does not change when a tenant's rent changes. However, if there is a unit transfer, the security deposit can be transferred or it can be refunded and a new security deposit charged for the new unit.

The security deposit is held in an interest-bearing escrow account. At the third anniversary of tenancy and every year thereafter, the tenant will receive a check for interest earned on the security deposit less a 1% administrative fee. If interest rates are at 1% or below, or the security deposit is \$99.00 or less, no interest will be paid to the tenant.

The security deposit will be refunded upon move-out, less any unpaid rent or damages. Within 30 days after move-out, the tenant will receive a letter detailing the disposition of the security deposit. If the charges exceed the security deposit, the tenant will receive an invoice for the remaining balance.

In non Section 8 developments, the amount of security deposit is established by the owner and should not exceed one month's rent.

15. UNIT INSPECTIONS

At lease signing, a move-in inspection will be conducted. The unit must be decent, safe, sanitary, and in good repair. The tenant has 5 days to report any additional deficiencies to Columbus Property Management & Development, Inc. to be noted on the move-in inspection form. If

cleaning or repair is required, the work must be completed within 30 days of the lease signing. The inspection form must be signed and dated by both the applicant and a Columbus Property Management & Development, Inc. representative.

The inspection form must be made part of the lease, as an attachment to the lease.

Management reserves the right to inspect the apartment at anytime it deems necessary.

16. ANNUAL RECERTIFICATION

Each year, the staff of Columbus Property Management & Development, Inc. must conduct a recertification of the tenant's family income and composition. At that time, the tenant's rent and assistance payment, if applicable, must be recomputed, based on the information gathered. Tenants must supply the information requested by Columbus Property Management & Development, Inc. for use in the recertification process in accordance with HUD requirements. Annual recertifications do not have to be processed for tenants paying market rent. Market renters will be given proper notification of requested and approved rent increases, and will be offered the opportunity to be recertified at that time.

The annual recertification process will be conducted in accordance with the HUD Handbook 4350.3 regulations.

When the property has LIHTC units Columbus Property Management & Development, Inc. must certify each resident within 12 months from the move-in date. When a full recertification is performed all anticipated income and income from assets will have third-party verifications to maintain eligibility. This recertification process follows the same rules as described for Section 8. Columbus Property Management & Development, Inc. will:

- Issue all residents the notice of the annual recertification requirement.
- Interview members of the household to see if changes in status have occurred.
- Have all third-party verification release forms signed and returned.
- Compare verified household income to the current income limit.
- When management has received all verification forms and has determined that the household is still eligible, then management must have all members of the household sign the complete recertification form.
- Sign a new unit lease, if required.
- Give copies of the annual recertification and new lease, if applicable.

<u>Note:</u> It is important that management use the current income limits for recertifications. The household's income <u>does not</u> have to be at or below the elected set-aside income limit for recertification eligibility. If the new income of the resident is above this elected set-aside income limit, management compares the household's current income to 140 percent set-aside limit. The

unit's rent continues to be rent restricted, and the unit and the household remain qualified under the LIHTC Program.

If the resident's income at recertification increases to the 140 percent limit, the household is NOT required to vacate the LIHTC unit. If the household income exceeds 140 percent, the "Available Unit Rule" is implemented, which allows the 140 percent household to remain program qualified.

17. INTERIM RECERTIFICATION

For those tenants covered by the Section 8 Program, an interim recertification is required when one of the following conditions arise.

- A family member dies or permanently moves out of the unit.
- The tenant proposes to move a new member into the unit.
- A member of the household was unemployed on the most recent certification or recertification and now obtains employment.
- The tenant's income cumulatively increases by \$200 or more per month.

Tenants may request an interim recertification due to any changes occurring since the last recertification that may affect the total tenant payment or tenant rent and assistance payment for the tenant. All interim recertifications will be processed in accordance with the HUD Handbook 4350.3 regulations.

18. HOUSE RULES

Columbus Property Management & Development, Inc. house rules will be provided and signed by the applicant at lease signing. They will become an attachment to the lease. These house rules will be within the guidelines of the HUD handbook 4350.3.

Should the house rules change, Columbus Property Management & Development, Inc. will provide the HUD required notice of the changes and the appropriate effective date to all in place tenants.

These rules are considered an attachment to the residential lease agreement. If a tenant is in violation of these rules it may be determined that the tenant is in violation with the terms and conditions of the lease and may be terminated for "other good cause".

As with any violation of the terms and conditions of the lease, Columbus Property Management & Development, Inc. will notify the tenant of such violations in writing.

19. VIOLENCE AGAINST WOMEN ACT

The act, along with Columbus Property Management & Development, Inc., protects victims of domestic violence, dating violence or stalking -- as well as their immediate family members --

from being evicted or being denied housing assistance if an incident of violence is reported and confirmed. The law requires HUD to issue a "certification form" that domestic victims can submit to their housing provider in order to request protection under the Violence Against Women Act.

20. HOUSE CHARGES

Columbus Property Management & Development, Inc. has a posted listing of charges for damage to a unit beyond normal wear and tear. This list is based on actual charges for equipment or fixture replacement and the cost of labor based on hourly rate. These charges are posted in the management office and this posting is updated on an annual basis.

Columbus Property Management & Development, Inc. will charge the appropriate security deposit as noted in this plan and for any item as defined in the residential lease and Tenant Hand Book which are an attachment to the lease.

21. PET POLICY

Columbus Property Management & Development, Inc. does allow pets in their developments. Columbus Property Management & Development, Inc. changed their pet policy on 6/1/2012. Prior to that date Columbus Property Management & Development, Inc. was not a pet friendly community except for cases of Reasonable Accommodations.

The pet policy is as such:

MANDATORY PET RULES

Permitted Pets – Tenants are permitted (1) one common household pet in their residence. The term "common household pet" refers to a domesticated animal such as a dog, cat, bird, fish or turtle that is traditionally kept in the home for pleasure rather than commercial purposes. A common household pet does NOT include reptiles (except turtles). No rodents (i.e. mice, hamsters, <u>guinea pigs</u>). No rabbits. In the case of fish, no tanks larger than one with a 10-gallon capacity are permitted. Pets may be maintained in the unit as long as it is not a nuisance. Actions that constitute a nuisance include but are not limited to abnormal or unreasonable noise, crying, shrieking, scratching or unhygienic appearance.

Registration – Pet owners must register their pets with their property manager before the pet is brought on the premises and must update the registration annually. Registration must include the following:

- Certificate of vaccination (cats and dogs).
- Information sufficient to identify the pet and to demonstrate that it is a common household pet.
- Name, address, and phone number of at least one responsible party who will care for pet if owner dies or is unable to provide care.

• Proof of appropriate State and Local Licenses (I.e. registration/License number) for cats and dogs.

Vaccination– Pets need to be vaccinated in accordance with state and local law. Evidence of vaccination must be presented at registration.

Pet Care Standards – In order to protect the premises and health, safety, and welfare of tenants, employees, and the public the following standards are mandatory:

- All pets must be vaccinated.
- All dogs and cats must be spayed or neutered, and evidence of this procedure must be presented at initial registration.
- Pet owners are required to control any noise and/or odor which may result from their pet.
- Pets must remain quiet and under the unit owners control at all times. Residents may not have a dog that barks frequently and/or disturbs other unit owners. Any pet that causes a nuisance or any unreasonable disturbance or noise shall be permanently removed from the unit within (10) ten days written notice from Management. Actions that constitute a nuisance include but are not limited to, abnormal or unreasonable crying, barking, scratching or unhygienic offenses.
- No pet may be left unattended for more than 24 hours.
- No pet may be kept in the basement. All pets are barred from laundry rooms and social rooms.
- Pets must not be vicious and must not have bitten, attacked, harmed or threatened anyone in the past. Any pet that bites anyone must be removed from the building immediately.
- Pets not owned by a tenant may not be kept on the property (no pet sitting).
- Pets may not be left unattended in common areas of the property.

Pet Restraint – All pets must be restrained and under the control of a responsible individual while on the common areas of the property. Pets must be leashed in the common areas. Leashes may not extend a length that will permit close control of the pet.

Disposal of Pet Waste – All removable pet waste must be removed and properly disposed of by the owner. There is a pet waste charge of 5.00 per occurrence on a pet owner who refuses to remove pet waste.

Refundable Pet Deposit (not applicable for pets allowed under reasonable accommodations requests). A \$300 pet deposit is required, with \$50 due before the pet is brought onto the property. Over the course of the lease, the remaining \$250.00 will be paid out in \$10.00 monthly installments. CPM will use the pet deposit to pay for expenses directly related to the presence of the pet including but not limited to the cost or repairs, replacement and or fumigation (I.e. pest

control for fleas) of the tenants unit. CPM can also use the pet deposit to pay for the cost of animal care facilities or the protection of the pet. If the health or safety of the pet is threatened by the death or incapacity of the pet owner, CPM may contact appropriate animal care facilities or local authorities to remove the pet. The unused portion of the pet deposit will be returned to the tenant within a reasonable amount of time after the tenant moves from the unit or no longer owns or keeps a pet in the unit. The pet deposit only applies to cats and dogs.

The standard pet deposit fee of \$300.00 is expected upon registration of the Pet. The Pet deposit is required, with \$50.00 due when the pet is brought onto the property. Over the course of the lease, the remaining \$250.00 will be paid out in \$10 per month installments. The deposit will go towards damages that the pet makes in the unit. The unused portion of the pet deposit will be returned to the tenant within a reasonable amount of time after the tenant moves from the unit or no longer owns or keeps a pet in the unit.

(Pet Deposits not applicable for animals that are medically or therapeutically necessary and/or are used to assist individuals with disabilities).

CPM may refuse to register a pet if any of the following applies:

- The pet is not a common household pet. No rabbits, no rodents allowed.
- The pet owner fails to have their pet vaccinated or licensed as required by state and local laws.
- The pet owner fails to have their dog or cat neutered or spayed.
- The pet owner fails to complete the initial pet registration or annual registration.

Written notice will be provided by CPM if management refuses to register the pet.

Pet Rule Violation:

If the pet owner is found to be in violation of the Pet Rules, the pet owner will be issued a Pet Rule Violation and the owner will have (10) ten days from the date of the letter to remove the pet, correct the alleged violation, or make a written request for a meeting to discuss the violation.

Failure to comply with the above established pet rules will result in being out of compliance with your lease and could result in lease termination.

Requests for Reasonable Accommodations are allowed. These Mandatory Pet Rules will be an attachment to the lease and all tenants who choose to keep common household pets are required to be in compliance with this policy.

Applicants may reject a unit offered if it is in close proximity to a unit with a pet. The pet policy is in compliance with the requirements identified in the HUD Handbook 4350.3 and violations of the policy may be grounds for termination of the pet owner or removal of the pet.

23. OCCUPANCY STANDARDS

General guidelines established for general occupancy and the number of household members in a unit by size. The general standards to be used are:

Zero Bedroom One Bedroom Two Bedroom Three Bedroom Four Bedroom no more than 1 person no less than 1- no more than 2 persons no less than 2 -no more than 4 persons no less than 3-no more than 6 persons no less than 4-no more than 8 persons

Part II

For <u>*Each Program*</u> and/ or Building we will include in Part II the following information as applicable to the program.

- 1. Household/Project Specific Eligibility Requirement
- 2. Citizenship status as dictated by program
- 3. Social Security Numbers to assure HUD compliance, LIHTC and HOME eligibility
- 4. Rent Calculation based on the program
- 5. This Unit Must be their Only Residence
- 6. Size Requirement based on occupancy standards
- 7. Income Limits by program, project or funding institution/restrictive covenant

HUD publishes income limits. On an annual basis, HUD publishes income limits by the number of household members in the unit. For purposes of selecting the correct number of family members, managers must count everyone in the household except:

- Foster children and adults;
- Children not living in the unit at least 50% of time;
- Live-in care attendants.

Management must count unborn children and children in the process of being adopted as members of the household for income limit purposes.

Count the household members and compare the number to the per person income limit.

Shelter Plus Care

Purpose

The Shelter Plus Care Program provides rental assistance for hard-to-serve homeless persons with disabilities in connection with supportive services funded from sources outside the program.

Shelter Plus Care (S+C) is a program designed to provide housing and supportive services on a long-term basis for homeless persons with disabilities, (primarily those with serious mental illness, chronic problems with alcohol and/or drugs, and acquired immunodeficiency syndrome (AIDS) or related diseases) and their families who are living in places not intended for human habitation (e.g., streets) or in emergency shelters. The program allows for a variety of housing choices, and a range of supportive services funded by other sources, in response to the needs of the hard-to-reach homeless population with disabilities.

Eligibility

1. Household

The definition of who is homeless is found in <u>Section 103</u> of the McKinney-Vento Act and also referenced in the regulations at 24 CFR 583.5. A homeless person is someone who is living on the street or in an emergency shelter, or who would be living on the street or in an emergency shelter.

A person is considered homeless only when he/she resides in one of the three places described below:

- 1. places not meant for human habitation, such as cars, parks, sidewalks, and abandoned buildings;
- 2. an emergency shelter; or
- 3. transitional housing for homeless persons.

If a person is in one of these three places, but most recently spent less than 30 days in a jail or institution, he/she qualifies as coming from one of these three categories.

In addition to the above three categories as noted in the 2005 NOFA and beyond, projects providing Transitional Housing including, Safe Havens, or Supportive Services Only projects may also serve populations meeting the following:

- 4. eviction within a week from a private dwelling unit and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing; or
- 5. discharge within a week from an institution in which the person has been a resident for 30 or more consecutive days and no subsequent residence has been identified and he/she lacks the resources and support networks needed to obtain housing.

Persons who are not homeless may not receive assistance under Shelter Plus Care. Examples of

people who are not homeless are those who are:

- 1. In housing, even though they are paying an excessive amount for their housing, the housing is substandard and in need of repair, or the housing is crowded;
- 2. Incarcerated;
- 3. Living with relatives or friends;
- 4. Living in a Board and Care, Adult Congregate Living Facility, or similar place;
- 5. Being discharged from an institution which is required to provide or arrange housing upon release; or
- 6. Utilizing Housing Choice Vouchers, except Katrina evacuees that received Katrina Disaster Housing Assistance Program (KDHAP) Housing Choice Vouchers.
- 2. <u>Citizenship Status</u>

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 imposed restrictions on eligibility for receipt of public benefits. Essentially, the law provides that illegal aliens *are not* to receive public benefits and specifies how the inquiry into a person's status is to be conducted. However, there is an exception to the law for community programs that are necessary for protection of life or safety. *SHP transitional housing* has been determined to be excepted because it provides short-term shelter or housing assistance, non-cash services at the community level and is not means-tested.

The exception does not apply to Shelter Plus Care permanent housing projects. For permanent housing projects, grantees that are governments are required to comply with the law and should contact their legal counsel for advice on how to comply. Grantees that are nonprofit charitable organizations are not required to, but may, verify an applicant's citizenship or immigration status before providing assistance. If a nonprofit elects to verify citizenship or immigration status, they must follow the procedures required by the Act and should consult with their legal counsel on how to comply.

Supportive Housing Program (SHP)

<u>Eligibility</u>

1. Household

The definition of who is homeless and disabled is found in <u>Section 103</u> of the McKinney-Vento Act and also referenced in the regulations at <u>24 CFR 583.5</u>. A homeless person is someone who is living on the street or in an emergency shelter, or who would be living on the street or in an emergency shelter without SHP assistance. See special guidance on serving youth and persons who may be illegal aliens in the Special Guidance sections below.

A person is considered homeless only when he/she resides in one of the three places described below:

1) places not meant for human habitation, such as cars, parks, sidewalks, and abandoned buildings;

- 2) an emergency shelter; or
- 3) transitional housing for homeless persons.

If a person is in one of these three places, but most recently spent less than 30 days in a jail or institution, he/she qualifies as coming from one of these three categories.

In addition to the above three categories as noted in the 2005 NOFA and beyond, projects providing Transitional Housing including, Safe Havens, or Supportive Services Only projects may also serve populations meeting the following:

- 4) eviction within a week from a private dwelling unit and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing; or
- 5) discharged within a week from an institution in which the person has been a resident for 30 or more consecutive days and no subsequent residence has been identified and he/she lacks the resources and support networks needed to obtain housing.

Persons who are not homeless may not receive assistance under SHP. Examples of people who are not homeless are those who are:

- 1. In housing, even though they are paying an excessive amount for their housing, the housing is substandard and in need of repair, or the housing is crowded;
- 2. Incarcerated;
- 3. Living with relatives or friends;
- 4. Living in a Board and Care, Adult Congregate Living Facility, or similar place;
- 5. Being discharged from an institution which is required to provide or arrange housing upon release; or
- 6. Utilizing Housing Choice Vouchers, except Katrina evacuees that received Katrina Disaster Housing Assistance Program (KDHAP) Housing Choice Vouchers.
- 2. Citizenship Status:

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 imposed restrictions on eligibility for receipt of public benefits. Essentially, the law provides that illegal aliens *are not* to receive public benefits and specifies how the inquiry into a person's status is to be conducted. However, there is an exception to the law for community programs that are necessary for protection of life or safety. *SHP transitional housing* has been determined to be excepted because it provides short-term shelter or housing assistance, non-cash services at the community level and is not means-tested.

The exception does not apply to SHP permanent housing projects. For permanent housing projects, grantees that are governments are required to comply with the law and should contact their legal counsel for advice on how to comply. Grantees that are nonprofit charitable organizations are not required to, but may, verify an applicant's citizenship or immigration status before providing assistance. If a nonprofit elects to verify citizenship or immigration status, they must follow the procedures required by the Act and should consult with their legal counsel on how to comply.

Low Income Housing Tax Credits

Social Security Requirement

Applicants must disclose social security numbers (SSNs) in order for the owner to make an eligibility determination. Social Security numbers must be verified with an original Social Security card or a formal document that contains the SSN such as a driver's license, a payroll stub, bank statement, or an identification card issued by a government agency, medical insurance provider, or employer.

Size Requirements Based on Occupancy Standards

No more than two persons should be required to share a bedroom. Children of the same sex may share a bedroom. Unrelated adults and persons of the opposite sex (except spouses) may occupy separate bedrooms. Children may share a bedroom with a parent, if the parent so wishes. This decision will be made by that parent.

All children expected to reside within the unit must be counted. This includes unborn children, children in the process of being adopted, and children who are subject to joint custody who live in the unit at least 50 percent of the time. Live-in attendants, foster children, foster adults, and children temporarily absent due to placement in a foster home are also counted when determining bedroom size. Children away at school who have established residency at another address or location as evidenced by a lease agreement should not be counted.

Section 8 Applicants in LIHTC Projects

When accepting Section 8 Voucher holders in a LIHTC project, the IRS states that owners may not deny occupancy based solely on the fact that an applicant is a voucher holder; however, these applicants do not automatically receive approval for occupancy. They must meet all other applicant standards in the owner's Resident Selection Criteria.

If it is a LIHTC Project, the credit owners must certify annually that they are not discriminating against Section 8 participants.

When leasing to a Section 8 participant, the owner uses the tax credit lease, along with the Section 8 tenancy addendum.

The Public Housing Authority (PHA) is responsible for verifying the participant's eligibility for the Section 8 Program and maintaining the tenant file. In addition, the PHA must complete a HUD Form 50058. The owner must secure copies of the HUD 50058 and the accompanying income verification for the property files; otherwise the owner must complete an income eligibility determination, including the written verification for the tax credit unit files. In addition, most HFAs require that the manager obtain a statement, signed by a PHA official, that the family meets the income eligibility requirements for the tax credit property.

Columbus Property Management & Development, Inc. chooses to do their own income eligibility determinations even if they receive correctly completed forms from the PHA.

Tax credit owners must be careful when determining Section 8 participant's eligibility for their properties. Voucher holders may have qualified for the Section 8 Program at an income limit higher than that set in a property's minimum set asides.

Even though the PHA is doing the certification, Columbus Property Management & Development, Inc. as the management of a tax credit property must require that the applicant sign any certification forms regarding full-time student status, non employment form, non child support and disposition of assets at less than fair market value if applicable.

Section 8 (Post 81 universe)

<u>Eligibility</u>

All rules and procedures in this policy will be carried out in accordance with the most current revision of the HUD handbook 4350.3. Applicants for assistance in Section 8 projects must qualify under the following eligibility factors. All eligibility factors must be met to be accepted as a resident under Columbus Property Management & Development, Inc.

The eligibility criteria are as follows:

1. Household

For a family already in occupancy, a remaining family member may continue to secure assistance as a single household after the qualified person vacates.

A household may have a live-in aide. A live-in aide is a person who resides with one or more elderly persons or a person with disabilities and it is documented that this assistance is essential to the care and well-being of the resident. Secondly, the live-in aide should not be obligated for the financial support of the resident, and lastly, this live-in aide would not be residing in the unit for any other reason than to provide assistance. When the resident vacates the apartment, the live-in aide must also vacate, even if that live-in aide is a relative of the resident who vacated the apartment.

If the resident is absent from the apartment (7 consecutive days or more), the live-in aide cannot remain in the apartment. The live-in aide and the resident will be required to sign an attachment to the resident's lease that denies occupancy to the unit to the live-in aide after the tenant, for whatever reason, is no longer living in the unit.

Other than the case of a live-in aide, no one other than those listed on the lease may reside in the unit for more than 14 consecutive days or more than 21 days in a twelve (12) month period, unless authorized by administration.

A person who meets the definition of a person with disabilities as defined for civil rights protections may or may not meet the definition of a person with disabilities as defined by program eligibility purposes. All admissions, policies, and procedures will be in compliance with HUD's Handbook 4350.3 regulations.

2. <u>Citizenship Status</u>

HUD published a final rule restricting assistance to non-citizens with ineligible immigration status. This rule was effective June 19, 1995 and applies to all projects under Section 8. The rule requires that citizens and those with eligible immigration status certify and document their status before being accepted as applicants for assistance. Columbus Property Management & Development, Inc. will follow all applicable HUD guidelines regarding the verification of immigration status, denial or pro-ration of assistance and the appeal process.

3. <u>Rent Calculation</u>

The resident must agree to the rental amount established in accordance with the 4350.3 regulations and after the completion of a 50059 and worksheet.

4. <u>Residence Criteria</u>

Assistance may not be provided to families who will maintain another residence in addition to the assisted unit. Double subsidies are prohibited. A family may never receive subsidy under more than one of the following programs at any given time; Housing Choice Voucher, Public Housing, Rent Supplement, RAP, Section 202, PAC, Section 202 PRAC, or any project-based Section 8.

5. <u>Size Requirements Based on Occupancy Standards</u>

No more than two persons should be required to share a bedroom. Children of the same sex may share a bedroom. Unrelated adults and persons of the opposite sex (except spouses) may occupy separate bedrooms. Children may share a bedroom with a parent, if the parent so wishes. This decision will be made by that parent.

All children expected to reside within the unit must be counted. This includes unborn children, children in the process of being adopted, and children who are subject to joint custody who live in the unit at least 50 percent of the time. Live-in attendants, foster children, foster adults, and children temporarily absent due to placement in a foster home are also counted when determining bedroom size. Children away at school who have established residency at another address or location as evidenced by a lease agreement should not be counted.

6. <u>Income Limits</u>

At properties with Section 8 contracts effective on or after October 1, 1981, only families at or below the very low-income limit are eligible for assistance. Under certain circumstances, the owner may request an exception to the very low-income limits. The very low-income limit consists of annual income between 31% and 50% of the area median income.

In order to be eligible for tenancy, an applicant's household gross income is compared to the HUD published income limits for the area (the limits are subject to change each year). If the annual income does not exceed the applicable income limits, the applicant would be eligible under this category.

7. Social Security Requirement:

Applicants must disclose social security numbers (SSNs) in order for the owner to make an eligibility determination. Social Security numbers must be verified with an original Social Security card or a formal document that contains the SSN such as a driver's license, a payroll stub, bank statement, or an identification card issued by a government agency, medical insurance provider, or employer.

If the applicant cannot submit the required documentation, then the applicant must submit the number and certify that the number is accurate and that no other documentation is available. The applicant must provide the required documentation within 60 days from the date of certification in order to maintain the household's place on the waitlist. If after 60 days, the applicant is unable to provide required documentation of a Social Security Number, the applicant will be denied eligibility.

Section 811

Purpose

The Section 811 program allows persons with disabilities to live as independently as possible in the community by increasing the supply of rental housing with the availability of supportive services. The program also provides project rental assistance, which covers the difference between the HUD-approved operating costs of the project and the tenants' contribution toward rent.

<u>Eligibility</u>

All rules and procedures in this policy will be carried out in accordance with the most current revision of the HUD handbook 4350.3. Applicants for assistance in Section 8 projects must qualify under the following eligibility factors. All eligibility factors must be met to be accepted as a resident under Columbus Property Management & Development, Inc.

The eligibility criteria are as follows:

1. Household

In order to live in Section 811 housing, a household which may consist of a single qualified person must be very low-income (within 50 percent of the median income for the area) and at least one member must be 18 years old or older and have a disability, such as a physical or developmental disability or chronic mental illness.

For a family already in occupancy, a remaining family member may continue to secure assistance as a single household after the qualified person vacates.

A household may have a live-in aide. A live-in aide is a person who resides with one or more elderly persons or a person with disabilities and it is documented that this assistance is essential to the care and well-being of the resident. Secondly, the live-in aide should not be obligated for the financial support of the resident, and lastly, this live-in aide would not be residing in the unit for any other reason than to provide assistance. When the resident vacates the apartment, the live-in aide must also vacate, even if that live-in aide is a relative of the resident who vacated the apartment.

If the resident is absent from the apartment (7 consecutive days or more), the live-in aide cannot remain in the apartment. The live-in aide and the resident will be required to sign an attachment to the resident's lease that denies occupancy to the unit to the live-in aide after the tenant, for whatever reason, is no longer living in the unit.

Other than the case of a live-in aide, no one other than those listed on the lease may reside in the unit for more than 14 consecutive days or more than 21 days in a twelve (12) month period, unless authorized by administration.

A person who meets the definition of a person with disabilities as defined for civil rights protections may or may not meet the definition of a person with disabilities as defined by program eligibility purposes. All admissions, policies, and procedures will be in compliance with HUD's Handbook 4350.3 regulations.

2. <u>Citizenship Status</u>

HUD published a final rule restricting assistance to non-citizens with ineligible immigration status. This rule was effective June 19, 1995 and applies to all projects under Section 8. The rule requires that citizens and those with eligible immigration status certify and document their status before being accepted as applicants for assistance. Columbus Property Management & Development, Inc. will follow all applicable HUD guidelines regarding the verification of immigration status, denial or pro-ration of assistance and the appeal process.

3. <u>Rent Calculation</u>

The resident must agree to the rental amount established in accordance with the 4350.3 regulations and after the completion of a 50059 and worksheet.

4. <u>Residence Criteria</u>

Assistance may not be provided to families who will maintain another residence in addition to the assisted unit. Double subsidies are prohibited. A family may never receive subsidy under more than one of the following programs at any given time; Housing Choice Voucher, Public Housing, Rent Supplement, RAP, Section 202, PAC, Section 202 PRAC, or any project-based Section 8.

5. Size Requirements Based on Occupancy Standards:

No more than two persons should be required to share a bedroom. Children of the same sex may share a bedroom. Unrelated adults and persons of the opposite sex (except spouses) may occupy separate bedrooms. Children may share a bedroom with a parent, if the parent so wishes. This decision will be made by that parent.

All children expected to reside within the unit must be counted. This includes unborn children, children in the process of being adopted, and children who are subject to joint custody who live in the unit at least 50 percent of the time. Live-in attendants, foster children, foster adults, and children temporarily absent due to placement in a foster home are also counted when determining bedroom size. Children away at school who have established residency at another address or location as evidenced by a lease agreement should not be counted.

6. <u>Income Limits</u>

These assistance contracts use the very low-income limit. The very low-income limit consists of annual income between 31% and 50% of the area median income.

In order to be eligible for tenancy, an applicant's household gross income is compared to the HUD published income limits for the area (the limits are subject to change each year). If the annual income does not exceed the applicable income limits, the applicant would be eligible under this category.

7. <u>Student Eligibility</u>

A student enrolled in an Institute of Higher Education, as defined by the Higher Education act of 1965-Amended in 1998, will be deemed eligible for assistance if the student meets all other eligibility requirements, passes screening criteria and is:

- 1. Living with parents/guardian, or
- 2. Over 23 years of age, or
- 3. A veteran, or
- 4. Married, or
- 5. Has a dependent child, or
- 6. Can prove independence of parents including providing certification that the parents did not claim the student on the most recent tax return, or
- 7. Has parents who are income eligible for the Section 8 program, or
- Is a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C.1437a(b)(3)(E)) and was receiving assistance under Section 8 as of November 30, 2005

Any financial assistance, in excess of amounts received for tuition, that an individual receives under the Higher Education Act of 1964 from private sources or an institution of higher education (as defined under the Higher Education Act of 1965) shall be considered income to that individual. There are two exceptions to this income calculation requirement. No financial assistance that an individual receives under the Higher Education Act of 1965 from private sources or an institution of higher education (as defined under the Higher Education Act of 1965) shall be considered income if the student is:

- 1) Living with his/her parents/guardian, or
- 2) A person over the age of 23 with dependent children
- 8. Social Security Requirement

Applicants must disclose social security numbers (SSNs) in order for the owner to make an eligibility determination. Social Security numbers must be verified with an original Social Security card or a formal document that contains the SSN such as a driver's license, a payroll stub, bank statement, or an identification card issued by a government agency, medical insurance provider, or employer.

If the applicant cannot submit the required documentation, then the applicant must submit the number and certify that the number is accurate and that no other documentation is available. The applicant must provide the required documentation within 60 days from the date of certification in order to maintain the household's place on the waitlist. If after 60 days, the applicant is unable to provide required documentation of a Social Security Number, the applicant will be denied eligibility.

9. Compliance with Services requirement

Applicants must agree to be connected to services in order to be eligible. If they are non compliant with services throughout the term of their tenancy or they graduate from services then they are ineligible to continue to receive subsidized housing in the H811 program.

10. EIV policy

- 1. Tenant data will only be used:
 - A. As a third party source to verify tenant employment and income to determine a household's eligibility for participation in the property's HUD rental assistance program;
 - B. As a third party source to verify tenant employment and income to determine the level of assistance that the household is entitled to receive;
 - C. To identify and correcting prior subsidy overpayments and/or underpayments;
 - D. For administrative monitoring/quality control during supervision/training of employees who perform tenant certifications; and
 - E. To determine whether an applicant or current tenant is currently living in another HUD-assisted property.

- 2. The data will not be disclosed in any way that would violate the privacy of the individuals whose data is included in the system.
- 3. The tenant will be notified of the following, via his/her acceptance, by signature, of the HUD-9887 Form, which gives our property permission to verify income data by checking with records kept by other government agencies:
 - A. HUD's and management's authorization to collect income data,
 - B. The purpose of the data collection and the ways in which the data will be used,
 - C. Tenant protections and rights, and
- 4. The consequences of failing to provide the information or consent to its collection.
 - A. During recertification interviews, each tenant will be provided with visual access to records pertaining to him/ herself and an opportunity to dispute the contents of the records.

A tenant may request assistance during his/her recertification interview. In this case, s/he must sign a release allowing the person(s) assisting (i.e. Service Coordinator, relative, social worker, translator) to view his/her EIV data during the interview process.

Management cannot provide copies of any EIV data to any third party, even upon tenant request. However, the tenant may request his/her own EIV data from management. A record showing which EIV data was released to the tenant will be signed and dated by both the tenant and management, and kept in the tenant file. Security of this data then becomes the tenant's responsibility.

5. During the review and tenant discussion of Income Reports and/or Income Discrepancy Reports, the tenant may dispute EIV information. Incorrect EIV information could mean that the tenant has been the victim of identity theft.

If a tenant suspects that someone else is using his/her SSN or has otherwise stolen his/her identity, management will advise him/her to:

- A. Check his/her Social Security records to ensure they're correct, by contacting the Social Security Administration, and
- B. File an Identity Theft Complaint with the Federal Trade Commission, and
- C. Request his/her credit reports, monitor credit reports, and place a fraud alert on all credit reports, with the three national credit reporting agencies.

Documentation that this advice was provided will be kept in the tenant file.

6. Owner/Managing Agent will:

A. Authorize the EIV Coordinator(s).

- B. Ensure that all authorized Coordinators and Users are using EIV data in accordance with HUD regulations, and that they are appropriately safeguarding EIV information. This includes but is not limited to ensuring that the Coordinator and/or management is:
 - 1) Requiring and documenting that all Coordinators and Users receive EIV training, including security training, prior to using EIV and again at least annually.
 - 2) Distributing appropriate updates of user guides, updated HUD requirements and security procedures to EIV Coordinators and Users.
 - 3) Recording and reporting improper disclosures in accordance with HUD's improper disclosure procedures.
- 4) Monitoring the use and confidentiality of EIV reports.
 - 5) Monitoring the security of EIV data storage areas.
 - 6) Monitoring the proper retention and disposal of EIV data.
- C. Ensure that there is an on-site EIV file on file at the site, containing the following:
 - 1) For each Coordinator:
 - -- Owner authorization letter
 - -- Initial and current approved Coordinator Access Authorization Form
 - 2) For each User:
 - -- The initial and current approved User Access Authorization Form
 - 3) Anyone whose job responsibilities require viewing EIV data, but who does not have EIV computer access, must sign and date a Rules of Behavior ("ROB") for Use of EIV Information for Individuals Without Access to the EIV System.

Completion of this ROB will be required before s/he can view EIV data printouts, or files which contain them. A copy of each ROB will be kept in the on-site EIV File.

- 4) List of all authorized Coordinators and Users, which will be kept up to date, documenting the dates that authorized Coordinator(s) and User(s) are added and/or removed.
- 5) Documentation of all Coordinator and User training, including the name, position and date of the person trained, as well as the type of training received. Property/management company staff who do not have access to EIV but who use EIV reports to perform their jobs are required to complete security training annually.

This file must be made available upon request for auditing and review purposes.

- 7. Earned Income Verification (EIV) Coordinator(s) will:
 - D. Assign access rights to EIV Users appropriately, based on their job responsibilities at specific sites.
 - E. Ensure that each EIV User has submitted a manual UAAF, submitted an online UAAF and passed the online EIV Security Awareness Test.
 - F. Recertify Users and their access to contracts twice annually.
 - G. Recertify him/herself as Coordinator annually.
 - H. Pass the online EIV Security Awareness Test annually.
- 8. EIV Users/Coordinators may, in order to implement the policies outlined in this document, access the EIV system on line, and view/use its data in printed form for the purposes of:
 - I. Determining whether an applicant or current tenant is currently living in another HUD-assisted property
 - B. Verifying tenant income in order to determine eligibility for participation in the property's HUD subsidy program(s)
 - C. Verifying tenant income in order to determine the level of assistance that the household is entitled to receive
 - D. Correcting identified subsidy payment errors

E. Monitoring the accuracy of the determination of tenant eligibility and/or level of HUD assistance, and that HUD-required procedures are being followed

Disclosure and Consent for Release of Information

At Move-In and at each Annual Recertification, management will disclose the following information to the tenant:

- 1. That management is required by HUD to verify income information used to determine eligibility for subsidy, and the amount of rent the tenant pays,
- 2. That management may verify information by checking with records kept by public agencies including the Social Security Administration, state agencies and the Department of Health and Human Services 'National Directory of New Hires,
- 3. That management must keep this information in tenant files in a location that ensure confidentiality,
- 4. That any employee who fails to keep tenant information confidential is subject to the enforcement provision of the State Privacy Act and enforcement actions by HUD,
- 5. That any applicant or tenant affected by negligent disclosure or improper use of information may bring civil action for damages and other relief against the employee,
- 6. That reasonable accommodation will be made for individuals who cannot read and/or sign a consent form due to a disability, in accordance with Section 504 of the Rehabilitation Act of 1973,
- 7. That tenants who fail to sign individual verification consent forms may have their assistance denied or terminated.

These disclosures are provided to tenants by use of the HUD-9887 Consent Form, which must be signed by each household member age 18 and older (as well as by any Head, Spouse or Co-Head under 18), except for live-in aides. A copy of the signed Consent Form must be given to the tenant household, and the original kept in the tenant file, in order for individual Income Reports to be used by property management.

A signed 9887 is not required for access or use of the Existing Tenant Search at the time of application processing and/or tenant screening. The existing tenant search is run in accordance with HUD Housing Notice H10-10. Applicants are notified that this report is being run to ensure that they are not receiving double subsidy.

When a household member attains 18 years of age between Annual Recertification's, s/he must

report to management within 30 days or by the time of the next recertification (whichever is earlier) and sign the household's Form HUD-9887 so that the data from the Income Reports for that household member can be used for the family's next recertification. Management will provide written notice of this requirement to each household with a 17-year old member, at the time of any Annual or Interim certification.

Failure to sign within this timeframe will constitute lease non-compliance, and the household's assistance and/or tenancy may be terminated. This notification requirement will be part of the property's House Rules.

Each household is provided with an Initial Notice of Recertification at move-in and at each Annual Recertification, as well as a 120-Day Recertification Reminder Notice (and 90-day and 60-day follow-up notices, if needed). These notices include a list of items the household is required to bring to the recertification interview, in order to document income and deductions.

At each Annual Recertification, each household receives a copy of the "EIV and You" brochure published by HUD. In addition, a copy of the "EIV and You" brochure will be provided to each applicant household as part of the final processing procedure before the family is offered a unit.

RESIDENT SELECTION CRITERIA

AchieveAbility is a private, nonsectarian, nonprofit organization that helps low-income, single parent, homeless families reach self-sufficiency by providing comprehensive, intensive, supportive social services in tandem with safe, decent and affordable housing.

In general, acceptance into the AchieveAbility Family Self-Sufficiency Program is a prerequisite for residency in AchieveAbility managed housing. When determining whether or not to accept an applicant into the program, AchieveAbility considers an applicant's need, motivation to succeed, compatibility with the AchieveAbility program.

Need

AchieveAbility is required to adhere to specific federal preferences pursuant to the government funding we receive relating to both AchieveAbility's housing projects and the social services provided. Traditionally, AchieveAbility has focused on the need for housing created by a crisis situation, i.e., living in a shelter, unsafe or overcrowded housing or paying an excessive portion of total income for housing so that homelessness is a present danger. The following three federal preferences adequately define and describe "need":

- 1. Substandard housing. Preference shall be given to those families living in substandard housing.
- 2. Excessive percentage of income for rent and utilities. A family that is spending over fifty percent (50%) of its income for rent and utilities is deemed to be at great risk of homelessness and so there is a preference for families in this situation.
- 3. Involuntarily displaced. Those who have been involuntarily displaced are applicants who have or will have to vacate their units due to man-made or natural causes.

Additionally, applicants must qualify based on the income restrictions imposed by the various funding sources of AchieveAbility managed housing. (LIHTC, HUD, Redevelopment Authority of the City of Philadelphia, Federal Home Loan Bank AHP Program)

Motivation

Motivation, although difficult to quantify, is of high importance. AchieveAbility's program structure requires as a condition of continued program participation that each head-of-household maintain unsubsidized employment, enrollment in an accredited school/vocational training and/or other activities targeted to promote the goal of making the transition to self-sufficiency. Failure to adhere to this requirement could result in separation from the program. It is, therefore, imperative that the head of household be personally motivated toward the program goal of self-sufficiency to successfully matriculate and achieve the goal. Factors considered for acceptance are an applicant's attempts to find and maintain employment, attempts at earning college credits, personal and professional goals, and articulation of his/her desire to succeed.

Compatibility

Families come to AchieveAbility with backgrounds characterized by homelessness, poverty, unemployment, limited educational opportunities, lack of access to quality healthcare, substance abuse disabilities and/or family violence histories. Compatibility serves a dual purpose in assessing eligibility and selection. It addresses the nature of the applicant's need for services and the agency's ability to meet those needs, as well as, the applicant's willingness to work closely and candidly with her or his social worker to achieve self-sufficiency.

Compatibility is an important area of evaluation. Our usage also provides several different levels of meaning. The first relates to the applicant's compatibility with the intensive supportive service program operated by AchieveAbility. Our program requires a great deal of communication between the tenant and his/her social worker. The program requires that the tenant be: willing to meet with the social worker regularly in order for AchieveAbility to provide continued and effective assistance. Areas such as personal finances, family development, parenting, housekeeping and other life management skills, as well as. progress in work and/or school are important elements that need to be addressed if the social worker is to be an effective resource and support toward self-sufficiency.

The second meaning of compatibility relates to the applicant's willingness to be participatory in the structure of the organization. Tenants are asked to serve on the board of directors, attend workshops that they have identified as a need and participate in three general tenant meetings each year. The agency benefits from the feedback provided by the tenants as to what components are working, not working or need adjustments.

The third meaning of compatibility relates to appropriately matching the level of service that an applicant may need and the level of service that AchieveAbility can provide. Some applicants may need a more structured environment or more intense support than AchieveAbility can provide, in consideration of our caseloads of twenty to twenty-five tenants per social worker. Conversely, an applicant may feel his/her need may be strictly housing, which is far less than what AchieveAbility offers. Our organizational objective is to identify applicants who will obtain maximum benefit from the services offered.



Date:

Dear Ms.

Thank you for your interest in the ACHIEVEability *Family Self-Sufficiency Program*. Attached you will find an application for ACHIEVEability's services. Please understand that filling out this application does not guarantee that ACHIEVEability will be able to provide services to you and your family. ACHIEVEability gets many applications and is not able to provide services to everyone who applies.

After we receive your completed application, we will contact you to provide the initial status of your application. We may invite you to our offices for an information session. Again, an invitation does not guarantee that we will be able to provide you services.

Please keep this page for your reference so that you may track the status of your application. If you have not heard back from us within 30 days, please feel free to call us to check on the status of your application. It is important that you read over the attached description of our program before completing the application. Please keep these forms for your reference. In order to remain a participant in our Self-Sufficiency Program, you must maintain consistent attendance in school, and maintain employment (or employment readiness activities).

Again, thank you for your interest in ACHIEVEability's program. We look forward to receiving your application back soon. Regardless of whether or not you join our program, we wish the best for you and your family.

Sincerely,

Ms. Sandra Whitfield







ACHIEVEability is a family self-sufficiency program that provides services to homeless or formerly homeless, low-income, single parent families. Single parents must be at least 18 years of age, and must have *at least one child* who resides with the parent, (for whom the parent has legal and physical custody). One or more of the resident children must be no more than 17 years of age at the time of lease signing. Participation in the program will require the following: *working a part-time or full-time job (consistently and year round); attending school during the day, evening or weekends; attending tutoring; participating in* ACHIEVEability *life skills workshops, family activities and client meetings; meeting with an* ACHIEVEability *Self-Sufficiency Coach; attending to the needs of your children; and attending to your own needs.* There are four major aspects to our program:

Housing

ACHIEVEability operates 146 units (houses and apartments) in West Philadelphia. All of our units are between two and five bedrooms. Parents who enter our program live in their own unit and are responsible for both rent and utility bills. Rents are based upon family size, income and the type of property that a parent is living in.

Education

ACHIEVEability is not a housing program. It is a self-sufficiency program with the primary focus on education. We believe that education is the key to self-sufficiency. All of the parents in our program are working towards long-term educational goals. Parents enter ACHIEVEability at different stages in their educational journeys. However, to be eligible for our program you must either be enrolled in an educational program that provides a high school diploma, or you must have completed three sections of the GED. If a parent has not yet obtained a high school diploma or GED, we will provide individualized tutoring services. **Parents are required to obtain their high school diploma or GED within 8 months.**

Within three months of obtaining a high school diploma or GED, parents are required to begin working towards a college level degree at an accredited college, university or trade school in a program that is at least 18 to 24 months long. We will not accept certificate programs. The educational requirement is part of the lease; so if a parent does not continue with their educational plan they would no longer be able to remain in their housing unit.



Employment

To apply to the ACHIEVEability Self-Sufficiency Program, parents must work a minimum of 30 hours per week and earn a minimum of \$7.25 per hour.

However, if you reside in a shelter or transitional housing unit, there are a few alternate income sources that may be considered *for the enrollment process*. ACHIEVEability participants are expected to be both working and attending school. Most parents in the program are working full – time and attending school part-time.

During your time in ACHIEVEability, you will have an opportunity to work with our Employment Coach, who will assist in all employment efforts including employment workshops and employment retention.

Supportive Services

To assist parents in working towards their goals, ACHIEVEability provides the following supportive services: case management, GED tutoring, college level academic support, employment assistance, career planning and assessments, financial planning, family enrichment activities, family workshops, computer center, reading and math specialists, individual and family therapy, drug and alcohol counseling, teen activities and college preparation, transportation subsidies, homeownership savings program and a tenant association.

In order to provide the highest quality of services to our parents, ACHIEVEability does require each parent in the program to submit documentation to his or her Self-Sufficiency Coach on a regular basis. For example, in the area of education; each parent must submit copies of applications, registrations, financial aid reports and grade reports. In the area of finances, each parent must submit copies of bills pertaining to housing and household budgeting. In the area of parenting; each parent must submit, for each child, copies of the child's report cards and medical records. These are just some of the types of documentation that ACHIEVEability requires. It is also required that each family certifies its income to ACHIEVEability on an annual basis. This means that ACHIEVEability must get, each year, verification of all of your sources of income.



| 21 South 61st Street | |
|--|--|
| Philadelphia, PA 19139 p: 215-748-8750 | |
| f: 215-748-6969 info@achieveability.org | ACHIEVEability |
| www.achieveability.org | INDEPENDENT LIVES. STRONG COMMUNITIES. |
| Application for Services | |
| Application for Services | Today's Date: |
| Section One | |
| <u>Section One</u> In this section, please provi | de the following basic information about yourself and your family. |
| Section One In this section, please provi | |
| Section One In this section, please provi Name: | de the following basic information about yourself and your family. |
| Section One In this section, please provi | de the following basic information about yourself and your family. |

Work

Other

For each of your children, please write down his or her name, gender (male or female), age, grade and name of school or daycare facility. Include all of your children, whether or not they currently live with you.

| <u>Gender</u> <u>Age</u> <u>Grade</u> <u>School/Davcare</u> | Child's Name | Gender | Age | Grade | School/Daycare |
|---|--------------|--------|-----|-------|----------------|
|---|--------------|--------|-----|-------|----------------|





Section Two

In this section, please tell us about the vision that you have for yourself and your children by answering the following questions.

Education **Education**

What are your ultimate, long-term goals in this area? What type of degree do you want to earn? What field of study do you want to pursue? What school or schools do you want to go to? By what date do you want to achieve your goals in this area?

What positive things about you and your situation will help you achieve your goals in this area? What obstacles do you need to overcome to achieve your goals in this area?

Finances

What are your ultimate, long-term goals in this area? What career field do you want to pursue? What specific job do you want to have? How much money do you want to make per year? What kinds of things do you want to be able to afford? By what date do you want to achieve your goals in this area?

What positive things about you and your situation will help you achieve your goals in this area? What obstacles do you need to overcome to achieve your goals in this area?

Parenting

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What are your ultimate, long-term goals in this area? What goals do you have with respect to your children's education, personal development, health, character and career paths? By what date do you want to achieve your goals in this area?

What positive things about you, your children and your situation will help you achieve your goals in this area? What obstacles do you need to overcome to achieve your goals in this area? How can you tell whether or not your children are on track to accomplish these goals?

Personal

What are your ultimate, long-term goals in this area? What goals do you have for yourself with respect to health, relationships, recovery, community involvement, home management and other areas? By what date do you want to achieve your goals in this area?

What positive things about you and your situation will help you achieve your goals in this area? What obstacles do you need to overcome to achieve your goals in this area?



Section Three

ACHIEVEability offers many different services to help families become self-sufficient. So that we might better serve you should you enter our program, in this section, please tell us more about yourself and your family by answering the following questions.

Education

What is the highest level of schooling that you have completed?

Below high school diploma or GED
GED
High school diploma
Some trade school (School: ______)
Some college (School: ______)
Trade school certificate (School: ______ Field: _____)
Associate's degree (School: ______ Field: _____)
Bachelor's degree (School: ______ Field: _____)

When did you earn this degree?

Indicate any educational activity in which you are currently involved.

Indicate any efforts that you have made in the past to pursue additional education. Indicate dates and the reason or reasons why you stopped.

Do you have a student loan? If so, what is the amount of the loan? Is the loan in default?



| 21 South 61st Street Philadelphia, PA 19139 | |
|---|----------------|
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Section Four

Finances

Indicate your sources of income and the gross (before taxes and deductions) amount that you receive from each source each month.

| □ Employment | Amount: |
|--|---|
| \Box TANF (Welfare) | Amount: |
| Child Support | Amount: |
| □ SSDI | Amount: |
| Food Stamps | Amount: |
| □ Unemployment | Amount: |
| □ Other () | Amount: |
| If you are currently employed, please answer | the following. |
| Place of employment: | |
| Position: | Start date: |
| # of hours worked per week: | Hourly wage: |
| Please answer the following for the two most | recent previous jobs that you have had. |
| Place of employment: | |
| Position: | Start and end dates: |
| # of hours worked per week: | Hourly wage: |
| Reason for leaving: | |
| | |
| Place of employment: | |
| Position: | Start and end dates: |
| # of hours worked per week: | Hourly wage: |
| Reason for leaving: | |



Please answer the following about your current living situation.

| Length of time at this loca | ation: | # of 1 | pedrooms: | | |
|-----------------------------|---------------------|--------------------|-------------------|-----------------|--|
| Monthly expenses | | | | | |
| Rent: | | PECO: | | PGW: | |
| Phone: | | Cell phone: | | Cable: | |
| SEPTA: | | Car payment: | | Gas (car): | |
| Insurance: | Debt expense: | | Recreation: | | |
| Food: | | Clothes: | | Baby sitters: | |
| Child care: | <u></u> | Tuition: | | Household items | |
| Medical: | | Savings: | | Laundry: | |
| Other (specify): | | | | | |
| For each of your three mo | ost recent previous | living situations, | please answer the | following. | |
| Address: | | | | | |
| Monthly rent: | | | Length of sta | y: | |
| Reason for leaving: | | | | | |
| Address: | | | | | |
| Monthly rent: | | | Length of sta | .y: | |
| Reason for leaving: | _ | | | | |
| | _ | | | | |
| | | | | | |
| Address: | | | | | |
| Monthly rent: | | | Length of sta | .y: | |
| Reason for leaving: | | | | | |





Section Four

Parenting

For each of your children, please indicate how he or she is doing in school. Discuss grades, attendance and behavior.

For each of your children, please indicate his or her hobbies, talents, interests and strengths.

If any of your children are not in school or daycare, please explain why not.

If any of your children are not living with you, please explain why not.

Have you ever been involved with DHS? If so, please explain.



A copy of the official registration and financial information may be obtained from the Pennsylvania Department of State by calling toll free, within Pennsylvania, 1-800-732-0999. Registration does not imply endorsement.



Personal

Describe any history of domestic violence in your family (including yourself). Include information about the abuser, the length of the relationship, the type of abuse and any therapy or services that may have been received.

Describe any significant physical or mental health issues in your family (including yourself). Include information on diagnosis, medication, side effects, therapy, social services, mental health facilities and hospitalizations.

Describe any history of drug or alcohol abuse in your family (including yourself). Include information on past or current inpatient or outpatient programs, involvement with NA or AA, sponsor and home group, drugs used, length of use and age at which use began.







Describe any history of involvement with the criminal justice system in your family (including yourself). Include information on arrests, convictions, dates, types of crime, time served, probation and parole.

Why do you want to leave your current living situation?

Please discuss your current support system.

Please discuss your hobbies, talents, interests and strengths.





Section Five

How do you think ACHIEVEability will be able to help you become self-sufficient? If you enter ACHIEVEability's program, how long do you think it will take you to become self-sufficient? Explain your answer.

Please use this section to include any additional information that you would like for us to know.

Please sign this application below and return it to

ACHIEVEability Attn: Admissions Coordinator 21 South 61st Street Philadelphia PA 19139

In signing this application, you are saying that all of the information that you have provided is true and complete, to the best of your knowledge. If you provide information that is not true and complete, this may adversely impact your application.

Applicant Signature

Date



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