

WASHTENAW URBAN COUNTY EXECUTIVE COMMITTEE MEETING
Wednesday, December 1, 2021 - 2:00pm – 3:30pm
Location: Virtual Meeting using Zoom (details below)

Pursuant to Washtenaw County Board of Commissioners Resolution #21-050, this Committee will meet remotely, and the public can participate by joining via:

<https://washtenawcounty.zoom.us/j/81799637267?pwd=ZkF4aTduTHd2YVp0SnRoR1B0ZkhkQT09>

or by calling 1.312.626.6799 or 888 475 4499 (Toll Free), using Webinar ID: 817 9963 7267. These instructions are also posted on the OCED calendar [here](#).

A link to Urban County Executive Committee roster with members' contact information is available [here](#).

- I. Roll Call** - Each member state name and physical location (I.e. City or Township)¹
- II. Public Comment**
- III. Announcements from Members and/or Staff**
 - A. Warming Centers**
 - Daytime warming shelter: at Ypsilanti Freighthouse, 100 Market Place, Nov. 1 – March 31 Monday through Thurs (8am-6pm)
 - Separate daytime warming shelter in Ann Arbor
 - December Daytime warming shelter is Journey of Faith, 1900 Manchester, Ann Arbor. Dates and hours will be shared at or prior to UCEC meeting.
 - Winter overnight shelter for individuals: Delonis Center and partnering Congregations, Nov. 8 – March 31
 - B. CERA spending and application take-up**
 - C. Reminder: In-person Meetings resume January 2022**
- IV. Minutes**
 - A. 11-3-21 Meeting Minutes – Review & Approval (ACTION)**
- V. General Administration**
 - A. County Health Officer's COVID-19 Update (Jimena Loveluck, WCHD)**
 - B. Approval of proposed HOME Rental Policies – ACTION ITEM (Teresa Gillotti, OCED)**
 - C. 2022 Affordable Housing RFP Timeline – Discussion only (Tara Cohen, OCED)**
 - D. General Updates**
 - 1) Update: 2020 CDBG Public Services for COVID Response – United Way Year-round VITA
 - 2) Member Announcements
- VI. Public Comment**
- VII. Adjournment**

Next Meeting: Wed., January 5, 2022, 2:00 – 3:30pm, Location: Washtenaw County Learning Resource Center (4135 Washtenaw Ave., Ann Arbor, MI 48108)

WASHTENAW URBAN COUNTY EXECUTIVE COMMITTEE MEETING
Wednesday, November 3, 2021 - 2:00pm – 3:30pm
Location: Virtual Meeting using Zoom (details below)

Members in Attendance:

Supervisor Brenda Stumbo (Ypsilanti Township); Supervisor Diane O’Connell (Ann Arbor Township); Councilmember Elizabeth Nelson (City of Ann Arbor); Jessica West (Director of Community Development, Pittsfield Township); Joe Meyers (City of Ypsilanti, Director of Economic Development); Supervisor Ken Schwartz (Superior Township); Michelle Aniol (Community Development Manager, City of Dexter); Mike Greene (Assistant City Manager, City of Saline).

Members Absent: Supervisor Charles Tellas (York Township); Supervisor Diane Ratkovich (Dexter Township); Supervisor Duane Luick (Lima Township); Supervisor Laurie Fromhart (Bridgewater Township); Trustee Linda Adams (Augusta Township); Supervisor Gary Whittaker (Salem Township); Supervisor Jim Marion (Saline Township); Supervisor John Kingsley (Webster Township); Supervisor Ken Dignan (Northfield Township); Supervisor Ronald Milkey (Manchester Township); Trustee Sandie Schulze (Sylvan Township); Supervisor Will Hathaway (Scio Township).

Facilitator: Tara Cohen (filling in for Commissioner Shink)

OCED Staff Present: Tara Cohen; Teresa Gillotti.

Guests: Brandyn Walker (Avalon Housing); Jimena Loveluck (Washtenaw County Health Department).

Meeting called to order: 2:14 PM

I. Roll Call

Pursuant to [MCL 15.263 Sec.3](#), Cohen took roll call during which each member stated their name and physical location (i.e. City or Township, Washtenaw County, State of Michigan).

Aniol: Participating remotely from City of Dexter, Washtenaw County

Greene: Participating remotely from City of Saline, Washtenaw County

Stumbo: Participating remotely from Ypsilanti Township, Washtenaw County

Nelson: Participating remotely from City of Ann Arbor, Washtenaw County

West: Participating remotely from Pittsfield Township, Washtenaw County

O’Connell: Participating remotely from Ann Arbor Township, Washtenaw County

Schwartz: Participating remotely from Superior Township, Washtenaw County

One additional member joined the meeting after the initial roll call (approx.. 2:22pm)

Joe Meyers: Participating remotely from City of Ypsilanti, Washtenaw County

II. Public Comment

- Brandyn Walker introduced herself from Avalon Housing, noting she has been with Avalon a year now and is present on Wendy (Carty-Saxon)’s behalf. She shared that they hosted a successful open house recently for Hickory Way I, which is now fully leased up, and that they received their temporary certificates of occupancy for Hickory Way II. Additionally, construction of Hilltop View Apartments in Dexter is anticipated to be complete in the first quarter of 2022, and at their 108/110 Glendale property, a household is moving in today to the 110 unit. Walker thanked this group for its support of Avalon’s work.

I. Announcements from Members and/or Staff

- A. Warming Centers - OCED Director Teresa Gillotti provided a brief update on the following:
- Daytime warming shelter: at Ypsilanti Freighthouse, 100 Market Place, Nov. 1 – March 31 Monday through Thurs (8am-6pm)
 - Separate daytime warming shelter in Ann Arbor – Info coming soon.
 - Winter overnight shelter for individuals: Delonis Center and partnering Congregations, Nov. 8 – March 31
- B. CERA update – Tara Cohen provided the following updates on the COVID Emergency Rental Assistance program in Washtenaw County:
- 3,131 Applications received to date
 - 1046 Applications approved to date
 - \$7.2m disbursed to date (of \$16m available for direct assistance)
 - Seeking Volunteer Navigators for CERA pop-ups (see flyer)
- C. Meeting format in 2022 – Gillotti noted that as of now, the Open Meetings Act will require that all boards go back to in-person format as of January 1, 2022. However, the County is still determining capacity and guidelines for remote participation for the public. Cohen noted she will keep this group up to date as they know more.

II. Minutes

- A. 9-1-21 Meeting Minutes – Review & Approval (ACTION)

Moved by West. Support by Stumbo.

ROLL CALL:

Aniol: Yes

Greene: Yes

Stumbo: Yes

West: Yest

Nelson: Yes

Meyers: Yes

O'Connell: Yes

Schwartz: Yes

Ayes – 8; Nays – 0; **Motion carried.**

III. General Administration

- A. County Health Officer's COVID-19 Update (Jimena Loveluck, WCHD) - Health Officer Loveluck provided a presentation that can be found in the [agenda packet](#) starting on page 14. In addition to COVID related updates, she reminded the group of the importance of flu shots, and she also mentioned the [lead exceedance finding in Manchester](#). She noted that Public Health has responded to this issue with their mobile testing unit offering free lead testing to children and pregnant women, and she added that the Village office is offering water filters to residents who cannot afford them. A brief Q & A followed the presentation.
- B. HOME Rental Policies – Discussion only (Teresa Gillotti, OCED)
- Gillotti explained the background for creating draft rental policies for all HOME recipients in the County. She noted that these policies are very detailed, and she is still in the process of going through all of the sections, but Cohen will alert UCEC members once a complete set of draft policies are uploaded to the OneDrive folder. She mentioned that members will be expected to review thoroughly these drafts prior to the December 1st meeting, at which time staff intends to recommend adoption of the policies.

- C. Update: Urban County Needs Assessment – Discussion only (Tara Cohen, OCED)
Cohen gave a brief recap of the meeting held on October 6th, and then proposed that the annual resident survey be discontinued but utilized only for the development of future Five Year Consolidated Plan. Stumbo agreed it is a good idea to pause the survey for the time being. She then asked about Opportunity Zones and if there is a relationship to the HUD maps or how HUD allocates any of its grants; Gillotti explained the Opportunity Zones are a separate classification and do not factor in specifically to HUD formulas. Stumbo then asked if the Urban County will be receiving any ARPA funds; Cohen and Gillotti explained that we've been awarded \$4.5 million in HOME-ARP funds which are funds to be focused on maintaining or adding affordable housing, as well as providing support for people experiencing or at risk of homelessness. Gillotti explained that the County will have 10 years to spend these funds, so there is not a rush to utilize immediately, and Cohen explained that the Continuum of Care will have to develop a detailed Allocation Plan for HUD prior to these funds being released. Cohen noted that at this time only admin funds have been released for planning purposes. More information will be shared regarding HOME-ARPA in the future.
- D. UCEC 2022 Meeting Calendar – Discussion with Possible Action (Tara Cohen, OCED)
Cohen reviewed the proposed 2022 UCEC calendar, noting that meetings will return to in-person as of January 2022. She also reiterated that the County is still in the process of determining how to offer remote participation to the public for public meetings such as UCEC. Cohen invited a motion to approve the calendar if the group was ready to do so.

Moved by Stumbo. Support by Aniol.

ROLL CALL:

Aniol: Yes

Nelson: Yes

Stumbo: Yes

Greene: Yes

West: Yes

O'Connell: Yes

Meyers: Yes

Schwartz: Yes

Ayes – 8; Nays – 0; **Motion carried.**

- E. General Updates
1) Member Announcements

IV. Public Comment

V. Adjournment

Aniol moved to adjourn. Support from Stumbo.

Motion carried unanimously.

Adjourned: 3:06 PM

Next Meeting: Wed., December 1, 2021, 2:00 – 3:30pm, Location: Remote via Zoom

WASHTENAW URBAN COUNTY EXECUTIVE COMMITTEE (UCEC) MEETING
Wednesday, December 1, 2021 2:00pm- 3:30pm

AGENDA SUMMARY

COVID-19 Update (Jimena Loveluck, WCHD)

Washtenaw County's Health Officer Jimena Loveluck will provide an update on COVID-19 and related efforts, followed by time for Q & A from Committee members.

HOME Rental Policies – ACTION (Teresa Gillotti, OCED)

Director Teresa Gillotti will provide an overview of the draft HOME Rental Policies that were previously shared with Urban County in the OneDrive folder. These policies were developed in response to a HUD finding at the most recent HUD monitoring of the Urban County's HOME rental program. HUD noted that while most of the rules and requirements that would be included in a local policy are available in HUD guidance, that a separate policy should be adopted the Washtenaw Urban County. HUD staff recommended that OCED utilize Avalon Housing's policies and procedures as a model, and Avalon graciously provided their policies to OCED. Those policies served as a basis, but the point of the Urban County HOME rental policies will be to have all HOME rental program grantees develop their specific policies and procedures for implementing the rules on site. These include, but are not limited to items such as:

- Tenant selection criteria
- Household Income certification process
- Transfer policy for households who want a larger/smaller unit
- Waitlist policy
- Calculating rent
- Unit abandonment and more

Previous HOME grantees that will be subject to this policy include Ann Arbor Housing Commission, Ypsilanti Housing Commission, Avalon Housing, and Michigan Ability Partners. As part of the proposed motion below, staff would request a 6-month time frame for any previous grantee to adopt any relevant policies. The full set of draft policies are found in OneDrive [here](#) and are included in your packet for ease of review.

The goal at this meeting is to review and answer any questions about the proposed policies, followed by a motion to approve said policies for all Washtenaw County HOME grantees who operate rental housing. Once approved by UCEC, staff will post the policies on the OCED website and communicate with all relevant Grantees regarding the need to update or develop their own policies and procedures to take effect by no later than July 1, 2022.

Motion: *The Urban County Executive Committee approves the proposed set of HOME rental policies as written for the Washtenaw Urban County. Further, that all previous HOME grantees who operate rental housing with HOME-assisted units will have until July 1, 2022 to update their policies in accordance with the Washtenaw Urban County HUD HOME rental policies.*

2022 Affordable Housing RFP Timeline – Discussion only (Tara Cohen, OCED)

Each year, the HOME entitlement grant dollars – combined with HOME program income and/or any available City of Ann Arbor CDBG Program income – are allocated by way of a competitive Request for Proposals (RFP) process. The amount of funding is an estimate only, using the previous year's HOME allocation as a predictor. Key dates for this year's RFP are as follows:

12/9/21: RFP published

1/11/22 (10:30am – 12pm): Pre-Bid meeting on Zoom

<https://washtenawcounty.zoom.us/j/88013166707?pwd=K0s3YVQzTFhnQUxrOFE4anB2NTZLUT09>

Meeting ID: 880 1316 6707

Passcode: 777779

1/19/22: Questions due

1/26/22: Q & A posted

2/10/22 (3pm): Proposals due to Washtenaw County Purchasing

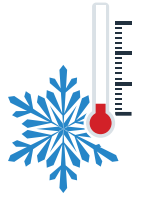
3/2/22: Scoring summary & funding recommendations made to UCEC

May/June 2022: Funding recommendations approved by UCEC and BOC as part of the 2022 Action Plan

Additional Information

If you have any questions on any of the information included in this summary, or would like additional information, please contact Tara Cohen at (734) 544-3056 or cohent@washtenaw.org.

2021-2022 DAYTIME WARMING CENTERS



Daytime Warming Centers are open to everyone seeking a warm place to shelter during the winter months. Daytime shelter accommodations are available at rotating locations throughout the season.

No pre-registration or referral is necessary to access daytime warming centers.

November 1, 2021 - March 31, 2022

Ypsilanti Freighthouse - 100 Market Place, Ypsilanti, MI
Monday - Thursday, 8am - 6pm

December 2021

Journey of Faith - 1900 Manchester, Ann Arbor, MI 48104
Monday - Friday

January 2022

St. Mary's Student Parish - 331 Thompson Street, Ann Arbor, MI 48104
Monday - Friday

February 2022

First Baptist Church - 517 E. Washington Street, Ann Arbor, MI 48104
Monday - Friday

If you seek daytime shelter on the weekend, please contact the Delonis Center at 734-662-2829, as locations may vary.

For updated times and locations, visit bit.ly/washtenaw-warming.



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COVID-19 Updates Washtenaw County

Washtenaw County Health Department
December 1, 2021

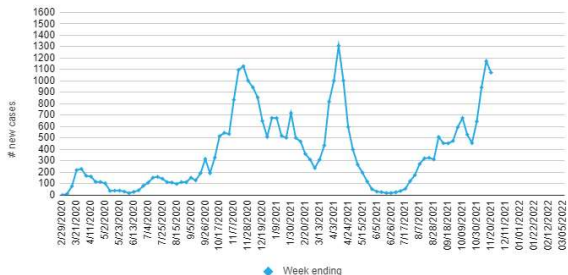


1

COVID-19 Current Situation

- Local transmission at “high”
- Vaccination continues to protect against severe illness & death
- Masks strongly recommended in indoor, public areas (& outdoor crowded spaces)
- Masks mandated in K-12 schools

New Confirmed COVID-19 Cases in Washtenaw County Residents (by Symptom Onset Week)* (as of 11/24), updated weekly
Washtenaw County (total N = 33752)

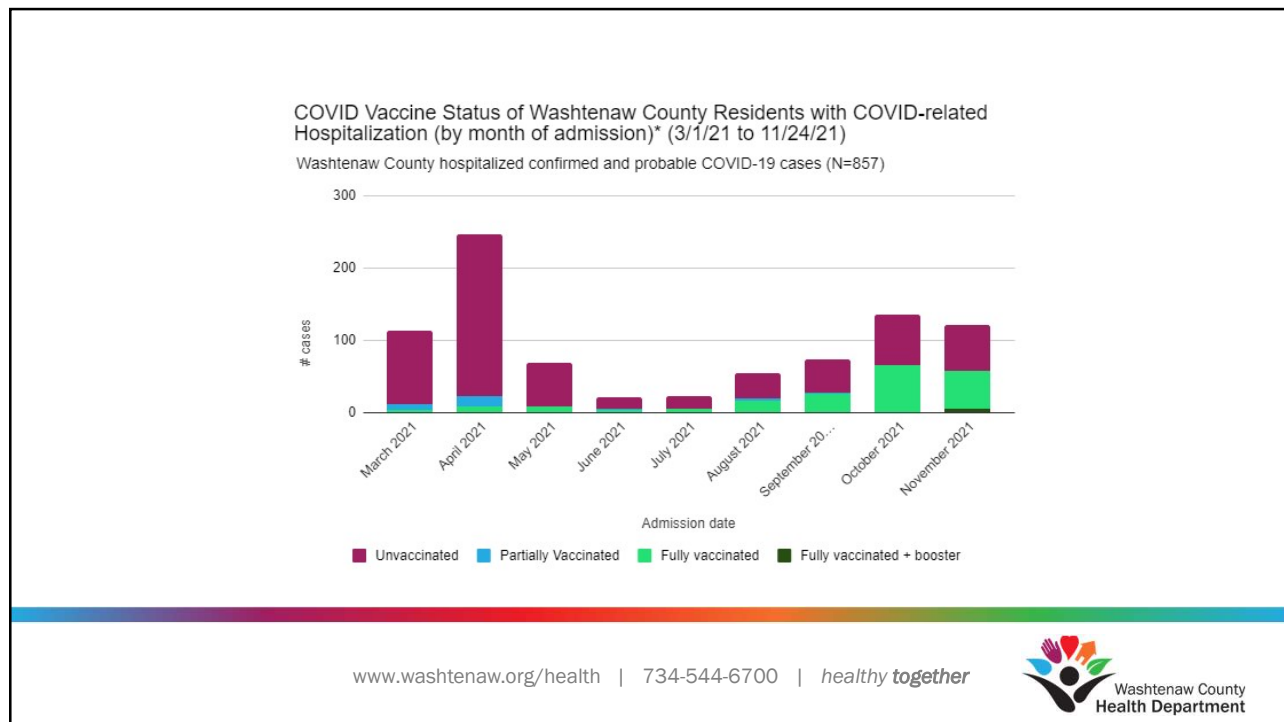


◆ Week ending

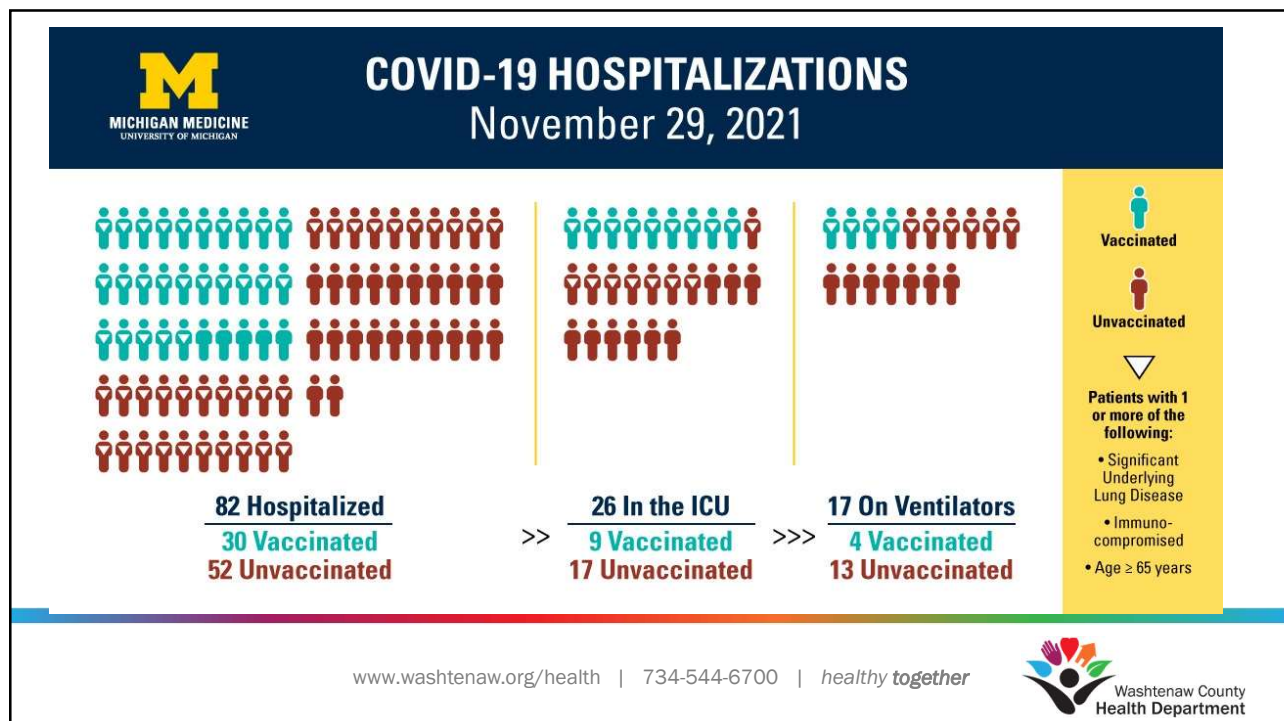
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2

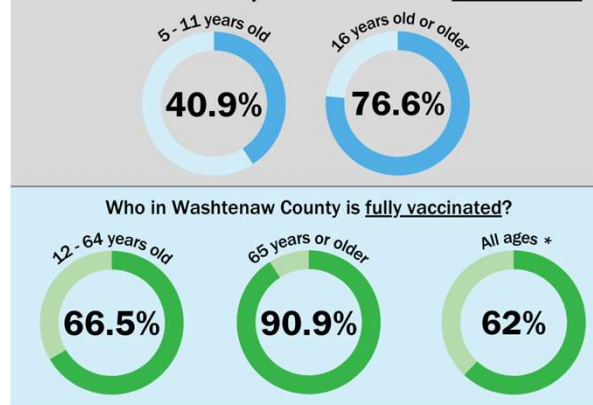


3



4

Who in Washtenaw County has received at least 1 vaccine dose?



Who in Washtenaw County is fully vaccinated?



As of 11/30/21

- Data obtained from the Michigan Care Improvement Registry (MCIR)
- *Fully vaccinated* indicates those who have completed a primary series of vaccine (2 doses of Pfizer or Moderna; 1 dose of Johnson & Johnson).
- *This number is as of 11/28/21. Vaccines are not authorized for all ages yet, but everyone who isn't vaccinated is vulnerable to COVID-19. This is the percentage of the whole county population that is fully vaccinated.

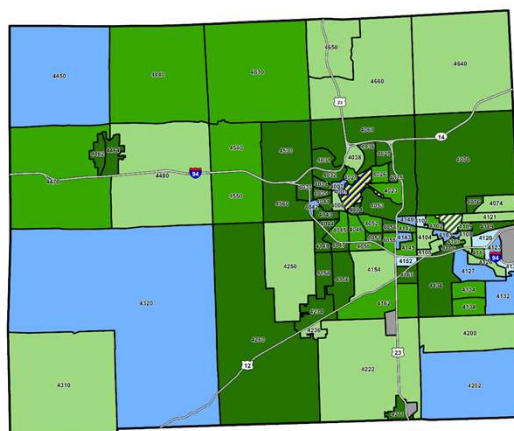


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Washtenaw County Census Tract Map (% of those 16+ who have received one or more doses)



Legend: Received 1 or more doses (% ages 16+)



Tracts not included:

- UM Campus/Student Housing
- EMU Campus/Student Housing
- Correctional Facility; Willow Run Airport

MCIR data as of 11/28/21

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Weekly Summary of Key COVID-19 Indicators in Washtenaw County – 11/26/2021

Outcomes	Current Data	Timeframe	Trend	Comment
Case Rates				
CDC Transmission Level in Washtenaw County	HIGH	11/17 – 11/24	—	High level since August 21st
Weekly case rate in Washtenaw County residents (per 100k)	377	11/17 – 11/24	↓	Weekly case rate in MI residents (per 100k): 558 (11/17 – 11/23)
Weekly case rate in 5-11 y/o (per 100k)	499.6	11/17 – 11/24	↓	
Weekly case rate in 12-17 y/o (per 100k)	227.3	11/17 – 11/24	↓	
Weekly test positivity rate in Washtenaw County from MI Safe Start	8.3%	11/17 – 11/24	↑	Weekly test positivity rate in MI: 18% (11/17 – 11/23)
Hospitalizations and Deaths				
Number of COVID-related new hospital admissions in Washtenaw County residents	76	11/11 – 11/24	↑	
Number of COVID-related deaths in Washtenaw County residents	2	11/11 – 11/24	↓	
Outbreaks – New and/or Ongoing over the past 28 days				
Total Outbreaks Reported	43	10/28 – 11/24	↑	New outbreaks in the past week: 8
Long-term Care Outbreaks	7	10/28 – 11/24	↑	New outbreaks in the past week: 1 Number of outbreaks over 10 cases: 3
K-12 Outbreaks*	17	10/28 – 11/24	↓	New outbreaks in the past week: 2 Number of outbreaks over 10 cases: 8
Vaccination Rates for Washtenaw County				
Weekly number of vaccine doses given by WCHD	897	11/18 – 11/24	↓	
Fully vaccinated – whole population	61.9%	As of 11/22	↑	
5-11 y/o vaccinated with 1+ dose	35.7%	As of 11/23	↑	

Legend: Indicator Going in the Right Direction No Change in Direction
 Indicator Going in the Wrong Direction



7

Variants

- Delta variant
 - More contagious than initial COVID strain
 - Layered prevention important
 - Medical (vaccine)
 - Non-medical (masks, distance, hand cleaning, isolation & quarantine)
- Omicron variant
 - No cases of this variant have been identified in the U.S. to date
 - Still a lot to learn, but we know what tools prevent COVID and we must continue to use them
 - Vaccines (and boosters) incredibly important



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Boosters & Additional Doses

- Boosters now recommended for everyone 18+!
- Additional doses available for immunocompromised people



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COVID-19 Vaccines for Kids

- COVID-19 vaccines recommended for everyone 5+
- Vaccinating kids will help...
 - lower community transmission
 - reduce burden of quarantines on families
 - keep kids in school
 - protect kids from COVID-19



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COVID-19 Vaccines

- It is critically important that those who haven't yet gotten vaccinated do so as soon as possible
- Get vaccinated at local health care providers and pharmacies
- Health Department clinic at 555 Towner in Ypsilanti now requiring appointments (walk-ins not available)
 - Schedule kids 5-17: <http://bit.ly/kidvaxwchd>
 - Schedule adults 18+: <http://bit.ly/wchdsched>
 - Those who cannot access online resources can call 734-544-6700

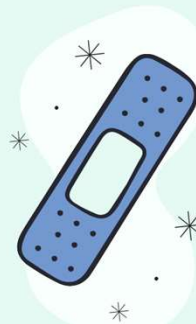
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**It's important
to get
vaccinated
against flu and
COVID-19.**

You can even get both vaccines
at the same time!



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12

2021 Winter Holiday Guidance

- **Get vaccinated & encourage others to do so**
 - If 18+ - get your booster if it's time
- If you're sick or have symptoms, **stay home** and away from others
- Consider risk factors if planning gatherings
 - Local transmission rates
 - If people aren't vaccinated, **or**
 - If people have health conditions or weakened immune systems



Layer up prevention strategies like wearing masks, moving gatherings outdoors, increasing ventilation, etc.

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MDHHS issues face mask Public Health Advisory due to rising flu and COVID-19 cases

All Michiganders, regardless of vaccination status, should take the following actions to protect against COVID-19 and other respiratory illnesses:

- A** All persons in indoor public settings are advised to wear a face mask, regardless of their vaccination status.
- B** Public establishments are advised to implement masking policies and encourage compliance with such policies.
- C** Individuals who are not fully vaccinated or who are immunocompromised are advised to avoid large crowds or gathering.

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Where To Find COVID-19 Updates

- www.washtenaw.org/covid19vaccine
- [Facebook](#), [Twitter](#), [Instagram](#), [NextDoor](#) (@wcpublichealth)
- Regular COVID-19 Vaccine Video Updates
 - Available in [English](#) and [Spanish](#)
- COVID-19 update email list
 - Sign up here: www.bit.ly/WCHD555
- Contact Lwchdcontact@washtenaw.org or 734-544-6700

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Additional COVID-19 Vaccine Resources

- [Vaccine Providers in Washtenaw County](#)
- [Vaccine Data: Who has been vaccinated in Washtenaw County?](#)
- [Michigan COVID-19 Vaccines Frequently Asked Questions](#)
- [Michigan COVID-19 Vaccine Dashboard](#)
- [Michigan COVID-19 Vaccine Website](#)

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Procedure 1.1

Establish and communicate process for selecting tenants for each HOME funded rental property

I. Policy Statement

Grantee will have documented process for selecting tenants that meets HUD standards. This could include working with the HARA (Housing Access of Washtenaw County), utilizing the local Community Housing Prioritization (CHP) list for individuals and families experiencing homelessness or establishing, communicating and maintaining wait list for each HOME funded property. This will allow subrecipients to have a sufficient number of potential household to fill vacancies.

II. Applicability/Scope

This procedure applies to all HOME funded properties and may vary between them. It is also possible that within a property, tenant selection may vary. For example, in a 20-unit property, 5 units may be dedicated to individuals experiencing homelessness, and tenants would be selected from the CHP list, while the other 15 may come from a separate wait list.

However units are determined, it should be clearly noted which units in the property are using which method for tenant selection.

III. Key Procedure Steps

1. The Grantee is responsible for managing tenant selection and any relevant Applicant List and/or Wait list. The managing of this information includes:
 - Households on the Applicant List yet to be processed.
 - Households on Applicant List currently being processed.
 - Households approved for the wait list
 - Households approved for housing
 - Households denied housing for this property
2. The list or wait list process must clearly state how those on the list are selected for housing, be it a random lottery, interviewed, screened, etc.
3. This list must be updated at least annually, and preferably, quarterly.
4. A process should be identified, communicated and utilized to repopulate the lists if they have been depleted, including any process or procedure for opening and closing the Applicant and/or wait list.

All processes should be available to the public and the PJ upon request.

Procedure 1.2

Application and Wait List Procedure

I. Policy Statement

Grantee will have a documented process for opening any wait list it maintains, to collect eligible household applications for housing. This will include how applicants are added to a wait list, selected from the wait list for housing and any tools used (random lottery, interviewing and screening), etc.

II. Applicability/Scope

Any income eligible individual or family may sign up to be on the Wait list. However, only a small number of these individuals and families may be selected for housing.

III. Key Procedure Steps

Grantee documented process should include the following information:

- Period the wait list is open;
- How the opening of the wait list will be communicated to potentially eligible households;
- Means by which households can sign up for wait list (online portal, in person, etc.);
- Communications process by which the grantee will notify applicants to the wait list if they have been accepted or denied to the list;
- How the wait list will be managed and maintained;
- Process by which individuals or households selected from the wait list for housing (prioritization, random lottery, etc.) and what information may be requested to determine ongoing eligibility and/or for selection purposes.

Procedure 1.3

Calculating Income Eligibility

I. Policy Statement

Grantees will move in households that fall within the income limits set for each property and unit. Grantee staff must ensure applicants are income eligible for HOME-assisted units when placing applicants on the wait list or offering them a unit.

Washtenaw Urban County asks that all grantees use the “Part 5 annual income” method when determining income. This previously referred to annual income as defined at 24 CFR 5.609 and was called the “Section 8” definition of income. Further, “adjusted income” will be used to refer to adjusted income calculated according to the rules at 24 CFR 5.611.

If there is an instance of another funding source requiring a different verification method, you may request to use an alternative income-verification method for a HOME-assisted property or units, if the income determination meets HUD’s overall guidelines.

II. Key Procedure Steps

A. The grantee will adopt and follow a policy and process for reviewing income eligibility which will likely include:

- Providing a clear process for an individual or household to apply for a unit and/or wait list
 - Indicating what income and related income verification information is required to apply for a unit and/or wait list
 - Noting the income and rent limits for individual units
 - Following up with the applicant as needed for updated income verification information and/or documentation
 - Written documentation of any acceptance, ineligibility or denial for housing and/or wait list.
1. As part of the adopted policy and process the grantee will have established a means to:
 - Assist the applicant in understanding and completing rental applications for unit and/or wait list including clarifying and assisting with getting
 - For each identified source of income, sends out corresponding third party verification forms.
 3. Upon receiving the requested information, the grantee:
 - Calculates projected gross annual income, including income from assets;
 - Documents projected annual income and percent of median;
 - Identifies specific properties for which the applicant is income eligible.

III. Regulatory Information

- HOME Regulations on Income Calculations
- Gross income is used to determine eligibility for housing. Adjusted gross income is used to determine whether or not rent will be impacted by their income, and by how much. At this

point in the application processing, property managers are determining eligibility for housing and therefore focused on gross income.

IV. Examples of sample forms and templates to include in formal process:

- Denial Letter
- Income and Asset Checklist
- Income Verification: Employment
- Most recent benefit letters (DHS, Social Security, etc.)
- Verification of Assets
- Consent for the Release of Information

INCOME CERTIFICATION QUESTIONNAIRE
(*NOTE: A separate questionnaire must be completed by each adult member of the household)

NAME: _____

☐ Initial Certification ☐ Recertification ☐ Addition of Household Member

YES NO

1. ☐	☐	I receive Section 8 rental assistance. If yes, list the housing authority below. _____	Amount of monthly rental assistance \$ _____
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INCOME INFORMATION

Include all income sources, including unearned income of minors.

YES NO

MONTHLY GROSS INCOME

2. ☐	☐	I am self employed. (List nature of self employment) _____	(use <u>net</u> income from business) \$ _____
3. ☐	☐	I have a job and receive wages, salary, overtime pay, commissions, fees, tips, bonuses, and/or other compensation: List the businesses and/or companies that pay you: Name of Employer 1) _____ 2) _____ 3) _____	\$ _____ \$ _____ \$ _____
4. ☐	☐	I receive cash contributions of gifts including rent or utility payments, on an ongoing basis from persons not living with me.	\$ _____
5. ☐	☐	I receive unemployment benefits.	\$ _____
6. ☐	☐	I receive Veteran's Administration, GI Bill, or National Guard/Military benefits/income.	\$ _____
7. ☐	☐	I receive periodic social security payments.	\$ _____
8. ☐	☐	The household receives <u>unearned</u> income from family members age 17 or under (example: Social Security, Trust Fund disbursements, etc.).	\$ _____
9. ☐	☐	I receive Supplemental Security Income (SSI).	\$ _____
10. ☐	☐	I receive disability or death benefits other than Social Security.	\$ _____
11. ☐	☐	I receive Public Assistance Income (examples: TANF, AFDC) DO NOT INCLUDE FOOD STAMPS	\$ _____
12. ☐	☐	I am entitled to receive child support payments through court order or other agreement. If yes, how many orders/agreements do you have? _____ If yes, from how many persons do you receive support? _____	\$ _____ \$ _____ \$ _____
13. ☐	☐	I am entitled to receive alimony/spousal maintenance payments	\$ _____
14. ☐	☐	I receive periodic payments from trusts, annuities, inheritance, retirement funds or pensions, insurance policies, or lottery winnings. If yes, list sources: 1) _____ 2) _____	\$ _____ \$ _____
15. ☐	☐	I receive income from real or personal property.	(use <u>net</u> earned income) \$ _____
		I receive student financial assistance (grants, scholarships, etc.) not including loans	

16. ☐ ☐	*NOTE: Count as income only if household receives Section 8 rental assistance.	\$_____ per semester
17. ☐ ☐	I am claiming zero income.	

ASSET INFORMATION

Include all asset sources, including assets of minors.

YES	NO		INTEREST RATE	CASH VALUE
18. ☐ ☐		I have a checking account(s). # of accounts held _____ If yes, list bank(s) 1) _____ 2) _____ 3) _____	_____% _____% _____%	6 MONTH AVERAGE BALANCE \$ _____ \$ _____ \$ _____
19. ☐ ☐		I have a savings account(s). # of accounts held _____ If yes, list bank(s) 1) _____ 2) _____ 3) _____	_____% _____% _____%	CURRENT BALANCE \$ _____ \$ _____ \$ _____
20. ☐ ☐		I have a debit card or paycard for direct deposit of benefits. # of cards held _____ 1) _____ 2) _____ 3) _____		CURRENT BALANCE \$ _____ \$ _____ \$ _____
21. ☐ ☐		I have a revocable trust(s) If yes, list bank(s) 1) _____	_____%	\$ _____
22. ☐ ☐		I own real estate. If yes, provide description: _____ I intend to: ☐ Keep ☐ Sell ☐ Rent ☐ Give Away ☐ Foreclose		\$ _____
23. ☐ ☐		I own stocks, bonds, or Treasury Bills If yes, list sources/bank names 1) _____ 2) _____ 3) _____	_____% _____% _____%	\$ _____ \$ _____ \$ _____
24. ☐ ☐		I have Certificates of Deposit (CD) or Money Market Account(s). # of accounts held _____ If yes, list sources/bank names 1) _____ 2) _____ 3) _____	_____% _____% _____%	\$ _____ \$ _____ \$ _____
25. ☐ ☐		I have an IRA/Lump Sum Pension/Keogh Account/401K. If yes, list bank(s) 1) _____ 2) _____	_____% _____%	\$ _____ \$ _____
26. ☐ ☐		I have a whole life insurance policy. If yes, name of insurance company _____ If yes, how many policies _____		\$ _____
27. ☐ ☐		I have cash on hand.		\$ _____

28. ☐ ☐	I have disposed of assets (i.e. gave away money/assets) for less than fair market value in the past 2 years. If yes, list items and date disposed: 1) _____ 2) _____		\$ _____ \$ _____
29. ☐ ☐	I have a safe deposit box at a financial institution. Name of institution: _____ Contents: _____ _____ _____		\$ _____
30. ☐ ☐	I have other personal property held as an investment, other income from assets or sources other than those listed above. If yes, list type below: 1) _____ 2) _____	_____ % _____ %	\$ _____ \$ _____

UNDER PENALTIES OF PERJURY, I CERTIFY THAT THE INFORMATION PRESENTED ON THIS FORM IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE. THE UNDERSIGNED FURTHER UNDERSTANDS THAT PROVIDING FALSE REPRESENTATIONS HEREIN CONSTITUTES AN ACT OF FRAUD. FALSE, MISLEADING OR INCOMPLETE INFORMATION WILL RESULT IN THE DENIAL OF APPLICATION OR TERMINATION OF THE LEASE AGREEMENT.

PRINTED NAME OF APPLICANT/TENANT

SIGNATURE OF APPLICANT/TENANT

DATE



We encourage and support the nation's affirmative housing program in which there are no barriers to obtaining housing because of race, color, religion, sex, national origin, handicap or familial status.



Procedure 1.4

Eligibility Criteria

Policy Statement

Grantee will likely receive funding from a variety of sources to develop and operate its housing. These sources, in turn, set certain standards that the grantee must meet regarding tenant income and other criteria. Grantee staff is responsible for tracking these requirements by unit and ensuring that the grantees households meet these relevant income eligibility criteria.

Applicability/Scope

This policy applies to the grantees HOME-assisted properties but is recommended for all properties with state and/or federal funds.

I. Key Procedure Steps

Grantees must maintain documentation related to income requirements, selection criteria and other requirements for each unit. Documentation should include at a minimum, the information on the attached grid.

1. The grantee will evaluate the household with respect to the following general eligibility criteria.

a. Income

- Required for all households
- Maximum level of income allowed varies by property, unit and program

b. Selection Criteria

- Grantee will select applicants for eligibility based on criteria which can include, individuals or families experiencing homelessness, referrals from Delonis and/or CHP list, returning citizens, specific waitlist, etc.
- Grantee staff will inform the household of the program eligibility requirements and benefits and asks if the household feels it may be eligible and willing to participate. If the household expresses willingness, the Property Manager then verifies eligibility requirements, including disability.
- Based on selection criteria, grantee staff will obtain relevant documentation to determine and document eligibility

2. Once selected, the grantee staff will:

- a. Determine if the household meets the full eligibility criteria for specific grants and funders
- b. Reviews the program guidelines of grants or funding for which the household is considered eligible

3. Prior to move-in, grantee staff will:
 - a. Ensure all necessary program documentation is contained in the tenant file or can be referenced from the file.
 - b. For tenants with Section 8 Certificates,
 - Reviews the lease sent by the Section 8 provider
 - Signs as appropriate
 - Schedules move-in to coordinate with any Section 8-required unit inspections
 - c. Arranges any other required unit inspections

I. Regulatory Information

- HOME Regulations
- Other funding depending on the project (LIHTC, etc)

II. Forms to Reference

- HOME property sheet (attached)

Property Name
Property Address
HOME assisted Units
Total units

Unit	Size	Final Income Limit	Rent Limit	Tenant selection type	HOME assisted	LIHTC assisted	Other assistance	High HOME unit	Low HOME unit	Project Based Voucher	Utility allowance
<i>List each unit in the property</i>	<i>1BR</i>	<i>List AMI %</i>	<i>FMR or MSHDA rent</i>	<i>Waitlist, Homelessness (CHP list), other</i>	<i>If yes, note AMI</i>	<i>If yes, note AMI</i>	<i>If yes, note AMI</i>	<i>Check if High HOME assisted unit</i>	<i>Check if High HOME assisted unit</i>	<i>Check if project based voucher</i>	<i>Note what utility allowance in use</i>

Procedure 1.5

Criminal Background Checks

I. Policy Statement

Grantees conducting criminal background checks on applicants must maintain a policy documenting how background checks are conducted and applied to all applicants. Use of background checks should be focused on ensuring the grantee has accurate information regarding potential tenants and can make leasing decisions that are appropriate for the individual, and the larger community.

Note at least one local unit of government (City of Ann Arbor), has established local laws related to the use of background checks. All grantees with properties or units in those jurisdictions are also subject to those laws.

<https://www.a2gov.org/departments/Housing/Documents/Fair%20Access%20to%20Housing%20Poster.pdf>

II. Applicability/Scope

Grantees must document their policy for background checks, note what is required by state and federal funders, and describe the process for how they will be conducted and used to make decisions about applicants and housing. The policy will comply with all federal, state, and local requirements.

III. Key Procedure Steps

- The policy will include who or what services are conducting the criminal background checks.
- The policy will include details of which elements of the background check are used to make decisions about housing placements.
- The process will include the grantee collecting a signed release from the applicant, allowing the grantee permission to run the criminal background check. This release should be on file with the application for housing.

Procedure 1.6

Tenant Selection

I. Policy Statement

Once the application process has been completed, the grantee will determine if the applicant meets the essential requirements of tenancy for housing and the criteria for the specific unit they are to be offered.

II. Applicability/Scope

This policy applies to all potential tenants.

III. Key Procedure Steps

B. In determining eligibility for housing, the grantee will have a policy and/or process to review the following aspects:

- **Household size:** Does the size of the household comply with the occupancy limits?
- **Income eligibility:** Does the household's income comply with income requirements for units or properties in the grantee's portfolio?
- **Grant eligibility:** Does the household comply with other specific funding or grant commitments made for grantee (such as HOME-assisted units)?

C. The grantee maintains a policy and process to determine whether the applicant meets the essential requirements of tenancy, which could include:

a. Ability to pay rent and other charges

- Review past history, references, current income, etc.
- Will the applicant pay rent and other charges in timely manner
- Have they been evicted for non-payment
- Do they have sufficient income to support unit rent
- Have they demonstrated a commitment to on-going rent and other payments

b. Ability to care for the unit

- Review past history, references, interview, etc.
- How has the applicant cared for or maintained previous housing / living situations?
- How have they left previous situations?
- Do they have a history of abusing property, not caring for units, or making conditions favorable for infestation?

c. Ability to be a good neighbor (maintain peaceful and quiet enjoyment)

- Review past history, interview, references, criminal background check, etc.

- Does the applicant have a history of violent or threatening behavior?
- Do they have a history of noise disturbances?
- d. Ability to comply with all lease terms
 - Review past history, references, interview, etc.
- D. The Grantee has a clear policy for when an applicant may be denied housing which may include a case where an applicant intentionally misrepresents information related to eligibility, housing history, or other factors.
- E. Grantee has a clear policy and process for accepting applicants who meet the household size, income eligibility and the essential requirements of tenancy, based on the grantees evaluation, including how the approval for wait list or housing is communicated to the tenant (such as a standard Wait List or Housing Approval Letter).
- F. Grantee has clear policy for assessing applicants with negative past history to consider “mitigating circumstances” and/or progress with past issues that might allow the applicant to be considered for the wait list or housing.
 - Mitigating circumstances must be verifiable in order to be factored into the screening process;
 - They must indicate the reason for the unsuitable rental history and/or behavior;
 - They must indicate that the reason for the unsuitable rental history and/or behavior is no longer in effect or is under control;
 - The applicant’s prospect for lease compliance must be an acceptable one, justifying admission.
 - Mitigating circumstances would outweigh information already gathered in the screening process.

Examples of mitigating circumstances might include:

- Evidence of successful rehabilitation;
- Evidence of the applicant household’s participation in social service(s) or other appropriate counseling service(s);
- Evidence of successful and sustained modification of previous disqualifying behavior.

Consideration of mitigating circumstances does not guarantee that the applicant will qualify for admission. The grantee will consider such circumstances in light of:

- The applicant’s ability to substantiate through verification the claim of mitigating circumstances and his/her prospects for improved future behavior;
- The applicant’s overall performance with respect to all the screening requirements;
- The nature and seriousness of any criminal activity that appears in the applicant’s record; and

- The anticipated ability of housing support services to assist the applicant in meeting the terms of the lease.

The grantee policy will note the process for communicating to the grantee acceptance into housing and/or the wait list through formal communication, including consideration of mitigating circumstances, as they are determined to be qualified for housing.

G. Grantee policy to include the process for selected applicant to receive an offer of the next available unit which could include the following elements:

- Household size and Unit Occupancy Requirements;
- Income eligibility;
- Ability to meet the terms of the lease;
- Order on the wait list; and
- Specific grant requirements.

H. Grantee will include in policy any limits on the number of times an applicant can decline an offer of the unit before being removed from a wait list and any exceptions. Two unit offers may be removed from the wait list. Policy will include info on how/when formal communication is provided the applicant noting potential denial of housing or placement on wait list.

Procedure 1.7

Appeals Process

I. Policy Statement

Grantee will establish a policy for any applicant who has been rejected for housing, providing a clear process for the applicant to appeal the decision.

II. Key Procedure Steps

The Grantee policy/process must include how the appeal process will be communicated to the denied applicant, for example, including in the denial letters information on how the applicant can appeal the decision.

- The appeal process should include an adequate time period for the applicant to appeal the decision, and clear steps as to how;
- The process should also indicate who at the grantee organization has the authority to review and consider the appeal, and what information will be considered in the decision;
- For the identified role or team making the decision on the appeal, the decision should be communicated to the complainant in writing;
- If the complainant is still dissatisfied with the decision, the policy will provide a means for the complainant to appeal to the grantee's governance board within a specific time frame, from the decision made by the designated staff/team;
- The policy will note a specific timeframe within which the governance board must respond to the complainant.

I. Regulatory Information

- HUD regulations
- [HOME regulations, including Section 92.253](#)

Procedure 2.1

Income Certification

I. Policy Statement

Grantee is required to verify income of applicants prior to move-in to ensure compliance with HOME and other state and federal funding that includes restrictions placed on properties and units. Grantee will utilize the Part 5 method to determine income eligibility to move into a HOME-assisted unit, unless an exemption is requested due to a conflict with another requirement from a state or federal source.

Grantee will create a clear policy and process for collecting, reviewing and calculating income to determine eligibility.

II. Key Procedure Steps

- Grantee policy may allow for initial income screening, and then full verification prior to occupancy of the unit using the Part 5 or gross annual income.
- Grantee will use [Part 5 definition](#) to confirm or recalculate gross income for all households.
- For properties that also have Tax Credits, the grantee may need to refer to IRS and MSHDA Tax Credit guidelines for all details on tax credit income certifications (See [MSHDA Low Income Housing Tax Credit Compliance Monitoring Manual](#))
- Grantee policy will include:
 - Determines if more than ninety (90) days have elapsed since the Income/Asset Checklist was signed.
 - If more than ninety (90) days have elapsed since the Income/Asset Checklist was signed:
 - Has household completed, signed and provided an updated Income/Asset Checklist;
 - Re-contacts all income sources to obtain new file documentation;
 - If less than 120 days have elapsed, but more than 90, grantee may establish a policy where a verbal verification with a note in the file may suffice;
 - Obtains any required self-verification information from the tenant. Some of the more common self-verifications that may be required include:
 - Asset Certification
 - Certification of Zero Income
 - Affidavit of No Alimony, Child Support

- Grantee policy will include process for follow-up if the household is not income eligible for the intended unit, which may include:
 - Evaluates if the household is eligible for any other grantee properties or units;
 - Indicates properties or units for which the household is eligible;
 - Returns the household to the wait list to repeat the process;
 - Sends out a denial letter for income eligibility if the household is no longer income eligible for any grantee properties.
- Once the grantee determines the household is still income eligible for the intended unit and the information is sufficiently up to date, the grantee policy will include process steps that will include:
 - Calculates rent if it is affected by income.
 - Completes documentation which could include the following forms prior to move-in:
 - Sample Format for Calculating Part 5 Annual Income
 - HOME Program Tenant Information Form
 - Other forms related to additional state/federal funding
 - Obtains tenant signature on relevant forms.
 - Enters income by source into Income Calculation.
 - Completes Income Cover Sheet
 - Files all income-related information in the appropriate section in the tenant file.
 - Submits any required forms to funders.

III. Regulatory Information

[HOME Regulations, Part 5 Definition](#)

[MSHDA Low Income Housing Tax Credit Compliance Monitoring Manual](#)

<https://files.hudexchange.info/resources/documents/HOMEGuideForIncomeAndAllowances.pdf>

24 CFR Part 5 Annual Income

HUD Income Calculator

IV. Forms to consider utilizing for income eligibility review

- Income/Asset Checklist
- Asset Certification
- Certification of Zero Income
- Affidavit of No Alimony, Child Support
- Student Eligibility Certification
- Property and Income Limits
- Sample Format for Calculating Part 5 Annual Income
- HOME Program Tenant Information form
- Income Calculation Form
- Income Cover Sheet

Procedure 2.2

Move-In and Lease Signing Procedure

I. Policy Statement

Grantee will implement established procedures for the move-in process to ensure that tenants are prepared for their transition and informed of their rights and responsibilities, that the unit is ready and that all necessary paperwork is completed in a timely fashion.

II. Key Procedure Steps

The grantee policy will lay out timing and process for move in, including tenant review of lease and relevant policies, required maintenance and inspection of unit prior to move-in, and relevant timing and communications. Policy will include process to do the following:

- a. Assess the appropriate move-in date as determined by maintenance.
- b. Conduct a walk-through of the unit to determine if any additional work is necessary prior to move-in.
- c. Ensure all income verifications for the tenant remain within funding requirements.
- d. Assess paperwork needs for lease signing based on the funding requirements.
- e. Establish rental rate and conveys to tenant (and payee if applicable). This is verbally communicated at the lease signing, and included as part of the lease packet.
- f. Establishes security deposit and conveys to tenant (and payee if applicable).
NOTE: Security deposit and rent payment need to be two separate payments.
- g. Compiles all forms to be signed with or provided to tenant at move-in.
- h. Notify maintenance of confirmed move-in date.
- i. Coordinates with maintenance for keys.
- j. To ensure that all steps are completed on the correct timeframe, the grantee should make use of a *Move-In and Lease Checklist*.

- k. The Grantee policy should indicate clearly actions to be taken prior to move-in which may include the following:
 - Choose appropriate lease;
 - Review lease and lease packet with the tenant. Complete security deposit/furnishing section of lease, initial with tenant in all places. Have tenant sign lease and supplement paperwork;
 - If applicable, review and have tenant sign any relevant lease addenda;
 - Collect rent and security deposit from the tenant. Grantee gives the tenant a receipt for payment;
- l. The Grantee should have a clear policy and process to review the following procedures with the tenant(s). Copies of each procedure should be provided to the tenant in a Lease Packet or similar (if applicable):
 - Work order or maintenance request procedure
 - Emergency work order request policy
 - Air conditioning and/or space heater policy
 - Fee schedule
 - Vehicle/parking policy
 - Recycling, disposal of large items, and dumpster information
- m. Grantee policy should allow tenant adequate time to fill out move-in checklist and/or review condition of the unit, and indicate when the checklist should be returned.
- n. Enclose copies of lease/lease addenda in tenant packet.
- o. Give one set of keys (one entry key and one mailbox key where applicable) for the unit.
- p. The grantee policy should include process for record keeping related to the following:
 - Processing any move-in forms or similar;
 - Notifies the staff team of the tenant's name(s), address, and phone number, to update the tenant master list;
 - Organize paperwork and file it accordingly;
 - Update the move-in log;
 - Collect move-in inspection form.

III. Regulatory Information

- MSHDA requirements
- [HOME Regulations, including Section 92.253](#)

IV. Forms to utilize in the move-in process

- Tenant Income Certification Forms
- Lease Packet
- Lead Based Paint
- Trash and Recycling Information
- Rights and Duties of Tenants Information
- Vehicle Registration Form (if applicable)
- Information on Carbon Monoxide
- Move-In Inspection Form
- Move-In Information Form
- HOME form to OCED
- Checklist of Items Updated for Move-In
- Move-In log

Procedure 2.3

Tenant File Creation

I. Policy Statement

Grantee will maintain a file for each household. Organization of tenant files is critical to effective property management and accountability. It is imperative that tenant files contain all pertinent and up-to-date resident and subsidy information, and that files be maintained consistently so that all authorized staff can understand files of each site. Files will also be available to OCED and/or HUD upon request.

II. Key Procedure Steps

The grantee will have established policy and process (including checklist) for creating and maintaining tenant files.

- c. The tenant file will include the following, as applicable:
 - a. Lease, Move-In and Move-Out Information
 - Lease Packet
 - Lead-Based Paint Form
 - Move-In Inspection Form
 - Move-In Information Form (for finance)
 - Record of Security Deposit Payments Form
 - Lease Addendum
 - Rent Increase Letters
 - Move-Out Unit Inspection
 - Move-Out Information Form (for finance)
 - Letter to Tenant regarding Security Deposit at Move-Out
 - Security Deposit Transfer Request
 - Status of Resident Occupancy
 - b. Application and Interview Information
 - Consent for the Release of Information
 - Application
 - Application Cover Sheet
 - Incomplete Application Letter
 - Acknowledgement Letter
 - Income, Landlord/Housing and Personal References
 - Applicant List Denial Letter
 - Interview Scheduling Letter
 - Interview Form
 - Wait List Denial Letter

- Wait List Approval Letter
 - Wait List Update Letter
 - Letters regarding unit offerings
 - Any additional correspondence during the application period
- c. Income Certifications and Recertifications
- Certification Cover Sheet
 - Low Income Lease Rider (tax credits)
 - TIC
 - 3rd party documentation
 - MSHDA Checklist
 - Consent for Release of Information
- Subsidy Information and Qualifications (if applicable)
- Homeless Documentation
 - Disability Documentation
 - Consent to Participate in Shelter Plus Care
 - Shelter Plus Care Information Data Sheet
 - Section 8 lease and rent information
 - HOME Program Tenant Information
- e. General Correspondence, Eviction Paperwork
- All general tenant correspondence not belonging in above categories (including notices of under/overpayment, bills for maintenance, etc.)
 - Incident Reports
 - Notices to Quit
 - Letters to tenant outlining violations
 - Court documents
- f. Maintenance Work Orders
- Work Orders
 - Letters and Notices to tenants concerning inspections, etc.
4. Grantees are responsible for safeguarding all tenant information in conformance with privacy guidelines.
5. Grantee will store files as required by funder guidelines, including at times, making a copy and storing off-site or in a fire-proof cabinet.

DRAFT HOME Rental Policies for Washtenaw Urban County 11-22-21 (adapted from Avalon Housing policies)

Procedure 2.4

Lease Term and Addenda

I. Policy Statement

Grantee will establish a policy related to a consistent lease and lease terms for all HOME-assisted units. Leases will be available to OCED and/or HUD upon request.

II. Key Procedure Steps

- Leases will have specific duration, likely a year, but may be month to month where vouchers and rental assistance are utilized;
- Lease terms will be consistent for all HOME-assisted units, with specific addenda related to particular properties as needed;
- Leases should provide information on use of common areas, access to shared areas and services, etc.;
- All leases should comply with federal, state and local laws;
- Copies of signed leases should be available to tenants upon request at no charge to the tenant.

Procedure 2.5

Service Referrals

I. Policy Statement

Grantee will utilize service referrals as appropriate to provide tenants with various supports including eviction prevention, support for families and children, and other needs as appropriate. To the extent that a Grantee has a service team, the Grantee should have a policy and process for referrals. If the grantee does not have support services on-site or through a related department, then the Grantee can develop a policy and process for training appropriate staff in applicable resources and referrals for tenants.

II. Key Procedure Steps

Grantee will establish process for sharing resources and making referrals to support services depending on the structure of Grantee organization. Process could include:

- Making resource guides available to all tenants or onsite in the office;
- Allowing support services providers onsite to assist with food access, tutoring, ESL, space for one-on-one meetings with tenants for counseling, workforce, development, support groups, etc.;
- Grantee can also have a support coordinator and support staff available, with an internal referral process for tenants.

Procedure 3.2

Lease Revisions

I. Policy Statement

Grantee will establish policy and process for Lease revisions with the goal of having lease revisions generally take effect at the end of the lease term. Grantee policy should provide at least 30 days' notice and potentially more for any lease revisions. Grantee may revise its current leases, or conditions thereof, from time to time. Grantee policy should define when and how proper notice of such revisions will be given to existing tenants.

I. Key Procedure Steps

Grantee policy and process should define the timeframe for renewing leases, and for approving and communicating changes to tenants. Policy may include the following:

- a. Reviews standard lease at least once every two years;
- b. Solicits input from Property Managers, Maintenance personnel, and other staff;
- c. Reviews input and proposes specific lease changes;
- d. Obtains approval;
- e. Determines which tenants will be affected by lease changes, generally exempting or deferring changes for those tenants in the midst of a year lease term;
- f. Prepares notices of impending lease changes for all affected tenants, including change and effective date.

Grantee policy will designate key staff to communicate the lease changes to tenants which may include:

- a. Copies all notices to be sent;
- b. Mails notices to all affected tenants to reasonably arrive at least thirty (30) days prior to the lease changes taking effect;
- c. Places copies of the notification in each applicable tenant file.

Procedure 3.3

Income Recertification

I. Policy Statement

Grantee will recertify incomes annually. All tenant incomes will also be certified at move-in.

II. Key Procedure Steps

1. Grantee will have clear process for initial income certification, as well as annual recertification. Staff will:

- a. Re-certify all tenants' incomes at initial move-in and annually thereafter
- b. Determine whether the household requires third party certification or if first party is sufficient.
- c. Collect relevant income information and use standardized check lists and forms to collect and document income. It is highly recommended that grantees provide a number of options for this process including, by mail, in person, and potentially online. The policy should provide adequate time – potentially up to 90 days, for recertification process.

Required forms could include:

- Annual Income Re-certification Cover Sheet
 - Income and Asset Checklist
 - Income Information Form
 - Consent for the Release of Confidential Information
 - Self-Addressed Stamped Envelope
- d. Calculate the annual income once the form is returned, clearly including information on the numbers and method used to calculate the income in the tenant file, including any cover sheets, and related documentation.

Policy must include clear timelines for income recertification to be sent to tenants, as well as timeline for reminder communication and additional mailings as needed.

Recertification must follow all HOME regulations for HOME recertification.

2. Issues with recertification including over-income tenants

- a. Staff should follow HOME guidelines in developing policy for addressing over-income tenants for HOME-assisted units.

- b. Policy should include procedures for assessing when someone is over- income and steps for reconciling, or potentially moving tenants out, according to HOME rules.

Procedure 3.4

Adding a New Household Member

I. Policy Statement

Grantee must have clear policy explaining when and how tenants may add members to their household if they meet the grantee's screening criteria and the proposed new member does not violate maximum occupancy standards of the tenant's unit.

II. Key Procedure Steps

Grantees will have clear process that can be provided to tenant explaining the steps for adding a household member to a unit. Those steps may include:

After receiving notification from a tenant that they would like to add a new household member, staff will:

- a. Review the occupancy guidelines for the unit and informs tenant whether an additional household member would be within occupancy guidelines
- b. Receive the completed application from the proposed new household member, as they would with any new move-in.
- c. Follow process for checking references, income, etc., as will any new move-in.
- d. Approve or deny the proposed household member based on screening criteria.

If the new tenant is approved, the new tenant is added to the lease as an occupant, unless the leaseholder requests they be added as a co-leaseholder. Staff will explain the difference between an occupant and a leaseholder.

- e. Sends out a denial letter, if the proposed new household member has been denied and an approval letter if approved. The letters are sent to the initial tenant with a copy to the proposed new tenant. If the proposed new tenant is a child, a stepped down process may be implemented. Non-wage income information is still required.

III. Regulatory Information

Grantee should also review local zoning occupancy codes to confirm that the number of occupants is in compliance with local standards.

Procedure 3.5

Internal Transfers

I. Policy Statement

Grantee must have internal transfer policy that follows the HUD Handbook 4350.3 – occupancy requirements of subsidized multifamily housing projects, as applicable.

II. Applicability/Scope

Grantee policy will clearly state reasons for transfer, and a process for implementing transfer requests including transfers for:

1. Medical Necessity (need for no-step entry or accessible unit).
2. Change in Family Size (larger unit if members are added, smaller unit if members are removed).
3. Accommodation of other special needs of the tenant in an effort to preserve housing and avoid eviction.

III. Key Procedure Steps

1. Tenant transfers come about in one of three ways:
 - a. Tenant requests a transfer due to medical need, or a need for a larger unit.
 - b. Grantee or subsidy provider determines that a tenant is over-housed (i.e. single person in a 2 or 3 bed unit).
 - c. Grantee determines that it is in the best interests of the community to transfer a tenant due to the specific needs of the tenant, in an effort to preserve housing and avoid eviction.
2. Grantee policy may include detail related to the failure of a tenant to cooperate with a mandatory relocation.

Procedure 3.6

Parking Policy

I. Policy Statement

Grantee will establish parking policy related to access to spaces and any limitations on use.

II. Key Procedure Steps

Grantee will establish the parking policy and communicate upon move in and communicate any changes with adequate advanced notice. Policies should consider including the following:

1. At move-in, have tenants complete a Vehicle Registration Form. This or a similar form can be used when there is a change or additional vehicle with the household.
2. The Parking Policy can include:
 - a. Limiting parking on the property to only registered vehicles
 - b. Limiting registered vehicles to tenants only
 - c. Limiting the number of vehicles per household (in particular for sites with limited parking).
 - d. Limiting registered vehicles to those with valid license plates
 - e. Requiring Vehicle registrations to be renewed annually.
 - f. Each parked vehicle must occupy only one space.
3. The parking policy should also address rules and requirements for:
 - a. Guest parking.
 - b. Dismantling, maintenance or repair of a vehicle. The Property Manager may bill the tenant for any damage caused to the property due to such activities.
 - c. Vehicles leaking oil or other potentially hazardous substances.
 - c. Car washing.
 - d. Storage of vehicles.
 - e. Non-functioning vehicles.
4. Grantee policy and process should also note when staff has the authority to tag any vehicle in violation of the policy. This may include:
 - a. Providing notice to give the owner 24 hours to correct the situation prior to towing.
 - b. If parking problems persists at a particular household, the Property Manager will send a letter to the household notifying them that grantee will tow immediately and without further notice any vehicle found in violation of this policy.

- c. Noting when the grantee reserves the right to tow a vehicle without notice to rectify an immediate problem (such as blocking the driveway or for snow removal).
- d. Policy should note who is allowed to tow a vehicle (property manager)

Procedure 3.10

Unit Entry: Emergencies and Health and Safety Checks

I. Policy Statement

Grantees will establish a policy and procedure for gaining entry into units in case of emergency or Health and Safety check. Such policy should be provided to the tenant upon lease up, and/or has been included in the lease.

See *Maintenance Policy 3.5 "Unit Entry"* for Maintenance specific procedures regarding entry to units.

II. Applicability/Scope

This Grantee policy is only applicable in the case of emergency and/or specific need for a Health & Safety check.

III. Key Procedure Steps

Grantee policy will define circumstances that would constitute an emergency or if there is reasonable cause to believe a health and safety check is necessary to confirm the well-being of a tenant. Grantee will establish protocol to enter a tenant unit without their permission. The policy may include:

Defining Emergency

In the case of an emergency situation, such as a flood, fire, or other situation which presents a clear and immediate danger to a tenant, tenant's individual unit, or the overall property, Grantee staff may enter a unit without prior permission from the tenant.

Once the unit has been entered, staff will seek to immediately secure the safety of the tenant and eliminate or reduce the threat. Emergency services such as the Fire or Police Departments should be notified as necessary.

Once the immediate threat has been resolved, staff will leave the unit in a secured state (ensuring that entry points such as doors or windows are locked or covered as necessary). Grantee will leave a notice on the front door of the unit explaining that entry was made in their absence and why.

Health and Safety Check

In certain situations, Grantee staff may need to perform a Health & Safety check with a tenant in their unit. These situations may include:

- Specific period the tenant has been missing for example, 72 hours or more;
- The tenant has unexpectedly missed appointments without contacting grantee;

- There is other evidence or reports from staff, tenants, or family/friends that indicate a Health & Safety check is necessary.

Based on knowledge of the tenant(s) and the overall situation, Grantee staff should communicate to determine whether a Health & Safety check is necessary or not. In all cases, Grantee staff shall make reasonable efforts to contact the tenant, including calling and visiting the unit, before performing a Health & Safety check.

If attempts to contact the tenant have failed, and staff determines that a Health & Safety check is necessary, the following grantee should have an established protocol to follow which may include:

- Grantee staff contacting non-emergency police number;
- Inform the dispatcher of the need for a Health & Safety check, and then (if not already on site) go to the tenant's unit;
- Grantee should unlock the entry door and allow the Police access to enter. The grantee staff does **not** enter the unit;
- Once the Police have determined the nature of the scene, establish possible outcomes which may include:
 - **The tenant is present, and there is a problem:** staff should proceed per the "Incident Reporting Policy" – getting immediate help to resolve the situation and following up with an incident report.
 - **The tenant is present, but there is no problem:** the police can immediately leave. The grantee should apologize to the tenant for the disturbance and explain why the Health and Safety check was made.
 - **The tenant is not present:** the grantee will leave a notice on the door explaining that entry to the unit was made in their absence. The grantee should also resume attempts to contact the tenant to determine if there is a problem. In the event that the unit is deemed to have been abandoned, please see policy 5.3 "Unit Abandonment".

Requests for entry by the Police

In certain circumstances the grantee may be contacted by the Police who are requesting entry to a tenant's unit. Staff should seek basic additional information and respond accordingly:

Is the request for a Health and Safety check?

If yes, then follow the procedure as detailed above.

Do the Police have a warrant to enter?

If yes, then Staff should meet the Police at the location, confirm the warrant and open the unit.

If there is no warrant, will the Police use force to enter the unit?

If yes, then the staff should meet the Police at the location and open the unit.

If no, then the staff should cite tenant privacy concerns and politely decline to open the unit.

Procedure 3.12

Process for Non-Office Hours Support

I. Policy Statement

Grantee will have a policy and procedure related to after-hour responses for management and maintenance-related emergencies.

II. Key Procedure Steps

- Grantee policy will note how tenants can contact property management or maintenance person for after-hours emergencies, and the contact information and list of typical reasons for after-hours calls should be made available at move-in.
- Policy should include procedure to ensure there is the ability to staff on-call situations.
- The grantee policy should designate a process for on-call support in the following cases:
 - a. Fire
 - Calls 911 if they are not on scene and have not been called;
 - Contacts the back up On-Call Staff;
 - Contacts grantee leadership, as warranted;
 - If significant, Maintenance and Property Manager respond in person.
 - b. Gas Leak/Persistent Gas Odor
 - Contacts Gas company;
 - Contacts Maintenance On-Call Staff;
 - Maintenance responds in person.
 - c. No Heat
 - Policy should have a procedure to assess if reason for no heat requires maintenance or is related to thermostat battery or similar issue
 - Policy should provide for options based on time of day, and could include:
 - If before 12:00 A.M. maintenance responds in person. If cannot fix easily, maintenance leaves tenant a space heater.
 - If after 12:00 A.M., the on-call person determines whether or not maintenance response is needed, recognizing that it is grantee's responsibility to ensure all units may be heated to at least 68 degrees.
 - d. Flooding/Frozen Pipes

- Contacts Maintenance On-Call staff
 - Manager or Maintenance tries to talk tenant through shut-offs.
 - Maintenance responds as soon as possible
- e. Plumbing Leaks (that cannot be contained by a pail)
- Contacts Maintenance On-Call Staff
 - Maintenance may attempt to talk tenant through shutting off water. Maintenance goes out if leak is unresolved.
- f. No Water
- In winter, contacts Maintenance On-Call Staff who go out right away (likely frozen pipes)
 - Other times of year, Maintenance may attempt to talk with tenant to resolve. If unresolved, maintenance goes out.
- g. No Hot Water
- Not an emergency unless tank is leaking or wires are sparking, in which case on-call personnel will correct that problem or stop further damage to the property.
- c. Toilet Overflowing
- Asks if water from tank or bowl (if from tank, Maintenance may be able to talk tenant through over phone).
 - Asks if water is going onto the floor
 - Informs tenant how to operate shut-off valves
 - Contacts maintenance, who responds in person if it cannot be addressed over the phone.
6. Toilet Not Working
- Will be dealt with on an individual basis. Main lines will be responded to as soon as possible and only to abate the immediate problem. Repair work will be performed on the next business day. If the unit has 2 bathrooms and only one toilet is stopped up, this does not constitute an emergency.
- c. Clogged Kitchen Sink with Standing Water
- Sink stop-ups are not not emergency unless there are extenuating circumstances.
- Sewer Back-Up
 - Contacts Maintenance who gives on-site response.
- d. No Electricity (except for general outage)

- Talks tenant through testing if GFIs or breakers (or contacts maintenance and ask them to talk tenant through this).
 - Contacts Maintenance if they need to go out. (For a refrigerator, they likely would need to respond, bedroom lights out at night, they could likely wait until the morning.)
 - On-call person contacts Detroit Edison if it appears to be general outage.
- m. Refrigerator Not Cooling
- Will be responded to between 4:30 P.M. Friday and 8:00 P.M. Sunday only. At all other times, tenant should be notified to keep doors closed and report trouble first thing the next morning.
- n. Smoke Alarms
- Asks tenant to describe the sound.
 - If chirping, talk tenant through replacing battery or instructs tenant it will have to wait until morning.
 - If it needs to be reset, Manager or Maintenance may be able to talk tenant through.
- o. Air Conditioning
- Only contacts maintenance to respond if a health hazard and is an grantee issued Air Conditioning unit. Evaluates if it may be electric that is the problem.
 - Contacts Service Partner if situation warrants.
- p. Blood and Bodily Fluids
- Contacts Maintenance Staff as required. Universal precautions are always used.
- The policy should address staffing for the following Management/Services-Related Calls:
 - a. Lock-Out
 - Sets standard for how/when staff will let tenant into their units unless extenuating circumstances apply. If the tenant needs a new key, it is their responsibility to get one during office hours.
 - b. Excessive Noise, Loud Parties
 - Sets standard for follow up which could include making a phone call, responding in person, requesting service partner drive by and evaluate or asks complainant to call back in a few minutes if noise continues, depending on situation and history.
 - c. Disruptive Guests

- Sets standard which could include assessing situation, addresses it over the phone, with a service partner assist, or by contacting police, as situation warrants.
- d. Police at the Site
 - Policy can include having staff gather significant information (units, tenants involved) over phone for next-day follow-up, and possibly go out to meet police, get case number or additional information, if situation warrants.
- e. Non-Tenants Sleeping on Grounds or in Common Areas
 - Policy can include contacting Service Partner and police (if situation warrants) and go out and rousts sleeper.
- f. Neighbor Incidents
 - Policy to include having staff talk with Neighbor, if possible. Next day follow-up.
 - Policy may require informing Executive Director next business day.
- g. Parking Problems
 - Policy to include how staff will addresses situation over phone if possible.
 - If a tenant is blocked in, attempts to contact other tenant if known.
 - On-going parking issues to be dealt with during business hours.
- h. Other Tenant Incidents
 - Policy to include how staff will assesses situation, addresses as necessary, brings in additional resources as needed.
- Policy should indicate when staff should advise tenants to call police or other emergency service provider if tenant expresses concern for their health or safety. Property Manager will inform Service Partner if police have been called to site.
- Policy should also identify process in case staff has concern for their own health and safety, they should assess situation and use their discretion to handle in safe manner. This may include:
 - a. Going out with second person, possibly from service team or other staff;
 - b. Going out with police presence;
 - c. Not going out at all, calling police or other agency to respond.
- The next business day, staff will completes an Incident Report if applicable. Such reasons for an incident report may include: guest issues, fire, excessive noise, threats, police involvement, etc.

Procedure 3.13

Fee Schedule and Exemption Process

I. Policy Statement

Grantee will establish and communicate policy for charging fees when warranted. Fees schedule could include, air conditioning services, rent-related issues (such as late payment of returned check fees), lockouts, lock changes, key replacements, and pets living in a unit (uncaged and caged). All are subject to federal, state and local laws.

II. Key Procedure Steps

Grantee policy to include fee schedule which includes for what fees are charged, description of fees, and actual fee amount. Fee schedule should be communicated to tenants at move-in and in cases when it is updated.

Example fee schedule below:

g Fee Schedule	Description	Fee
<i>Air Conditioning Fees</i>		
	A/C Removal/Installation	\$50
	A/C Utility Fee 2 Bedroom	\$100
	A/C Utility Fee 1 Bedroom	\$90
	A/C Utility Fee SRO/Efficiency	\$70
<i>Rent-Related Fees</i>		
	Late Fee - After the 5th	\$15
	Non-Sufficient Funds (NSF) Fee	\$25
<i>Lock Fees</i>		
	Lockout Fee (applicable between 10pm and 9am)	\$40
	Keys (cost per key)	\$5
	Lock change	\$40
<i>Pet Fees</i>		
	Caged Pet Fee (per pet)	\$50
	Uncaged Pet Fee (per pet)	\$75

III. Fee Exemptions

Grantee may establish fee exemption policy and may waive fees if deemed appropriate by the staff, according to policy. Possible fee waivers to include:

- Accommodation for a disability (such as a working or companion animal)
- The fee would put the tenant in a position of being eligible for eviction

- An external circumstance determined by the Property Manager to be not at the fault of the tenant (for example, a bank error, DHS error). Documentation will be required from the tenant to prove such instances.
- Extreme financial hardship outside of baseline income for the tenant, such as a loss or significant decrease in income

Grantee may establish in their policy a limit to the number of fee waivers per year.

Any fees, fee waivers and related documentation should be included in the tenant file.

Procedure 3.14

Tenant Grievance Policy

I. Policy Statement

Grantee will establish tenant grievance policy and procedure along with means to communicate the policy to tenants at move in, when updated, and as needed.

All tenants have the right to file a grievance if they feel their complaints have not been satisfactorily resolved, and a Notice of Grievance Policy must be provided to all tenants at lease signing. A grievance is defined as a complaint requiring administrative intervention. Tenant grievances may involve, but are not limited to, service delivery, staff members, the physical environment, and conflict with other residents or neighbors.

Tenants should be able to request a copy of the grievance form from any staff person and from the property office.

Other, more serious offenses must be filed as an Incident Report (please refer to Procedure **3.15 Incident Reporting Policy** for more information on Incidents). Any grievance brought to the attention of staff that meets the definition of an “Incident” should be treated as an incident pursuant to the guidelines of policy.

II. Key Procedure Steps

Grantee must have established policy and share it as part of the admission process at the initial lease signing. All tenants must complete an acknowledgement of understanding of policies regarding grievances and the process for filing a grievance. This form is to be filed in the tenant’s individual case file and a copy given to the tenant. This ensures that the grievance policy and procedure is clearly defined for all tenants. A tenant may exercise the right to file a grievance at any time.

Grantee must have process for filing all grievances and related documentation, making them accessible to appropriate staff members only. Copies of the grievance should be kept in all appropriate files, including the case file of the tenant making the complaint, and the files of any other tenants or staff named in the complaint. Efforts should be made to protect the anonymity of the tenant raising the grievance in files other than those of the tenant.

Grantees should establish a procedure for a tenant filing a grievance such as:

- a. Complete the form. Staff members will be available to assist the tenant with this process as needed. Any assistance should be confidential, and no individual should experience ill effects as a result of filing a grievance
- b. Grievance should be submitted to staff and/or property management. It should be assigned to the appropriate lead to investigate the complaint, ideally meeting or discussing the matter with the tenant who filed the grievance.

- c. The policy should denote a period of time for the management to respond to the tenant regarding the grievance, and the tenant may request and receive a written response.
- d. In the event that a grievance is filed about a management or higher-level leader, the grievance should go to the next highest level, such as the Executive Director
- e. If the tenant believes the grievance is still not satisfactorily resolved, appeal may be made to the Executive Director, who will investigate and respond within an established period of time.

The grantee will establish a procedure for a staff member receiving a grievance, such as:

- a. Once a grievance form has been received, the investigating staff member should read it thoroughly to review and understand what the complaint is.
- b. The investigating staff member should collect all appropriate information regarding the grievance, including:
 - Talk through the grievance with the tenant that filed it, ensuring they understand the nature of the complaint and collecting more detailed information as necessary;
 - Talk to any staff named in the grievance and establish their version of events;
 - Talk to any witnesses or other parties that can provide relevant information;
 - If applicable (for example, an event that occurred within sight of one of our cameras) review security camera footage;
 - If applicable (for example, a broken path leading to a fall) visit the site and take pictures;
 - Inform the staff member's supervisor of the complaint, using discretion and only revealing information that is necessary.

While investigating, the staff member should use discretion, and only share information as necessary to complete the investigation. The HIPAA rights of tenants must always be maintained.

- c. Evaluate the evidence collected from the investigation, and determine if the grievance is substantiated or unsubstantiated. If needed, the investigating staff member can consult with other staff, but confidentiality and HIPAA rights must be respected at all times.

If the grievance is determined to be unsubstantiated:

- Respond to the tenant that the grievance was determined to be unsubstantiated;
- Ask the tenant if they feel comfortable with the resolution;
- Inform the tenant of the appeal process if they request more follow-up;
- Document the process and action, (using appropriate forms), and report to supervisor, as well as keep in tenant files.

If the grievance is determined to be substantiated:

- The investigating staff member should gather a small response team
- The team should review the grievance and investigation, and then determine the appropriate action plan to make corrections. This plan should include action steps, a timeline for completion, and if any actions are needed from the tenant.
- Respond to the tenant that the grievance was determined to be substantiated and what the grantee's response to the situation will be.
- If the response to the grievance has caused policies or procedures to change, this information has to be communicated to any affected staff and policies and procedures should be updated accordingly.
- Document the process and action, (using appropriate forms), and report to supervisor, as well as keep in tenant files.

Filing of Paperwork

Grantee policy should include process noting that grievances have been addressed within an appropriate timeframe. Grievance may be reported to leadership including a board of directors at regular intervals (e.g. quarterly).

Procedure 3.15

Incident Reporting Policy

I. Policy Statement

Grantee will have an incident reporting policy and procedure in addition to the grievance policy and procedure. The Incident Policy will describe criteria for identifying a serious incident, providing prompt and timely notification to all interested parties, reporting and filing Incident Report Forms, procedures for investigating incidents, and roles and responsibilities. The policy is intended to protect the health and safety of tenants and to enhance the quality of services provided, by ensuring an integrated and comprehensive strategy for:

- Identifying, documenting, reporting, and investigating individual incidents on a timely basis;
- Reviewing individual incidents to identify appropriate preventive or corrective action;
- Identifying incident patterns and trends through the compilation and analysis of incident data;
- Reviewing incident patterns and trends to identify appropriate preventive or corrective action;
- Implementing preventive and corrective action plans; and
- Monitoring incident management practices and communication structures between partner organizations.

II. Key Procedure Steps

All events which jeopardize or may jeopardize tenant or staff safety must be reported, investigated and reviewed in a timely manner. Policy will also define serious incidents and process to address them, as well as means to inform the grantee leadership once the immediate danger/threat posed by the incident has been resolved.

Please note that incidents of child or adult abuse and/or neglect are reviewed in accordance with regulations set by State and Federal law. All staff are required to know these regulations.

Grantee should maintain a list and protocol of staff and stakeholders to be notified in the event of a serious incident. Policy should identify a staff person or role to maintain this list.

Investigations into serious incidents are to commence as soon as possible following the incident; if the incident occurs after work hours, the investigation should begin as soon

as possible the next morning; if the incident occurs during regular work hours, the investigation should begin as soon as the immediate danger has been resolved.

Grantees should have a procedure and specific timing for responding to non-serious incidents (e.g. within 24 hours and a preliminary investigation must be conducted within 72 hours.)

Staff will maintain an incident log and make arrangements for appropriate staff review of log prior when necessary.

Procedure

Grantee will establish a procedure for **reportable incidents**:

Reportable deaths, includes:

- The death of a tenant resulting from an apparent homicide, suicide, or unexplained or accidental cause; or
- The death of a tenant which is unrelated to the natural course of illness or disease; or
- The death of a tenant which is related to the lack of treatment provided in accordance with generally accepted medical standards.

Crimes – an event which is or appears to be a crime under Michigan State or Federal law, and which involves a tenant, either as the victim or the perpetrator. Tenants are held responsible for the actions of their guests while on Grantee property - please refer to lease for more information.

Missing tenants – a tenant who has not been accounted for when expected to be present and whose whereabouts are determined to be unknown for more than 72 hours. In these circumstances, Grantee will conduct a Health & Safety check (see the Property Management Health & Safety Check policy for more information).

Complaints of harassment, abuse or neglect - a statement by a tenant or others, that abuse or neglect has or may have occurred, and such statement is reasonably reliable.

Life Safety Issues including:

Injuries of accidental, self-inflicted, or unknown origin – bodily harm, pain, or impairment resulting from accidental or unknown origin which requires medical or dental treatment in excess of first aid.

Assaults – a physical attack using force or violence. Assaults are not limited to events that may be characterized as crimes.

Fights – a physical altercation between two or more tenants, other than an assault.

Serious Incidents:

- **Reportable deaths**
- **Serious harm to a minor (under 18 years of age) including allegations of child abuse or neglect**
- **Sexual assault**
- **Arson**
- **Fire that causes physical damage**
- **An event that triggers news media coverage.**

Internal Reporting, Notification of Appropriate Staff

Staff should immediately make known any of the circumstances listed above to his/her supervisor. The individual(s) involved in the incident should be notified as soon as possible. In the event of incidents that occur after hours, the reporting/observing staff member should contact the assigned on-call staff member, who will then decide whether to immediately contact the appropriate staff or notify the key staff when he/she next arrives for work.

Internal Reporting, Written

An Incident Report Form must be completed for each reported incident. The staff member with the most thorough firsthand knowledge of the incident should complete the incident report. Incident Reports should be typed using the Incident Report Form, written in a clear and concise manner, and should not include full names of other tenants/tenants involved in the incident. In the event that the Incident Report is externally distributed, any identifying information will be removed and kept in a separate file not to be distributed. The “Supervisor/Administrative Actions” section should clearly describe any immediate follow-up steps taken after the incident that will provide the staff with all relevant information when making recommendations.

Before submission of the report to grantee leadership, the staff should review the report completeness and accuracy and add or attach any additional information derived from their investigation. The completed incident report should be submitted within one business day of the occurrence of the incident. A process must be established for providing the form and supporting documentation to relevant staff, leadership as well as in grantee’s Incident Report files.

A process for documentation of investigations of **serious** incidents should be established including where to file originals and copies – and which staff should receive those copies, including timing.

Investigating a Reported Incident; Serious

Grantees should establish a procedure for investigation of a serious incident including how soon it will start (e.g. not later than 24 business hours after the report of the incident.)

The policy should detail roles and responsibilities including who serious incidents must be immediately reported to and how it should be communicated. It should also note what staff will be responsible for assessing the severity of the incident and based on the assessment who will be contacted to assist (likely other staff leads or the Executive Director or comparable role). Incidents that are not considered serious must be reported within 24 hours.

The policy will denote which roles will participate in the investigation of any serious incidents involving reportable deaths. The Executive Director may at his/her discretion become involved in investigating any incident. Senior agency staff may also request that the Executive Director participate in or direct the investigation of any other incidents.

Investigation interviews are intended to gather all relevant and pertinent information, including time and place of the incident, persons present, if known, and any other particulars or special circumstances, and details. Staff will include the badge number and name(s) of all EMS or police personnel in the report. Names, titles, telephone numbers, or other identifying information of emergency room staff are to be included in this report.

When a serious incident involving an individual or several tenants occurs, the following will also be included in the investigation:

- Thorough review of the tenant(s)' housing file and notes in Incident Log or other alerts, when relevant
- Thorough review of any prior incident reports regarding the tenant(s)
- Interview with relevant staff or any workers involved
- Staff at the site will be asked to give input regarding any other important sources of information

Contract agencies may investigate the incident at the site with the express written approval of the Executive Director.

The findings of the investigation should be documented and attached to the incident report. This documentation should include the name of the person(s) conducting the investigation as well as all pertinent information related to the investigation.

Analysis, Review, and Monitoring of Incidents

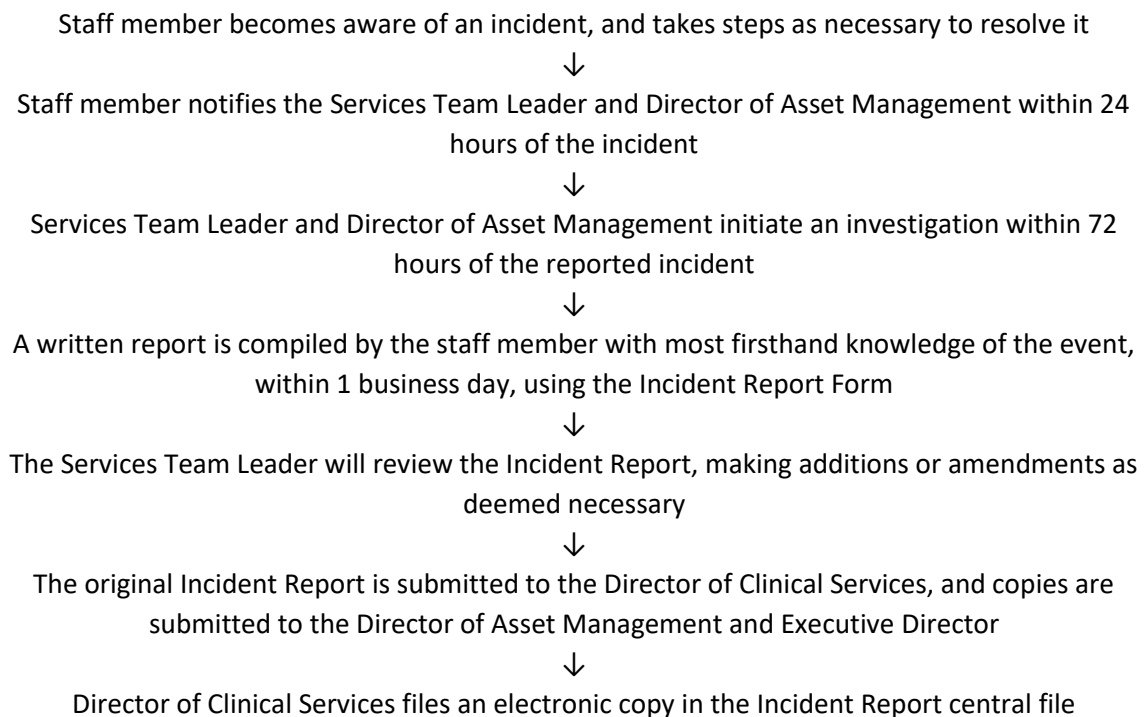
The grantee will establish a process for analysis, review and monitoring of incidents. Any group or team involved should establish a process for documenting conversations (such as minutes) and noting and recommendations or policy changes or measures as a result of the review.

The grantee will establish a process to monitor incident management practices for compliance with any requirements of the site's respective contracting agencies and the project's policies and procedures. The grantee will also monitor any preventive or corrective action that it has recommended.

It is recommended that grantees establish a flow chart including roles and responsibilities related to incidents and serious incidents at HOME funded sites. An example flow chart is below:

Flow chart of basic reporting and investigation procedure

General Incident



Serious Incident

Staff member becomes aware of an incident, and takes steps as necessary to resolve it

↓

Staff member **immediately** notifies the Services Team Leader (if they cannot be reached, the Director of Asset Management, the Director of Clinical Services, or Executive Director should be notified)



Services Team Leader and Director of Asset Management initiate an investigation as soon as the immediate threat has been resolved, or at the start of the next business day if outside regular hours



A written report is compiled by the Services Team Leader, within 1 business day of the incident, using the Incident Report Form



The original Incident Report is submitted to the Director of Clinical Services, and copies are submitted to the Director of Asset Management and Executive Director



Director of Clinical Services files an electronic copy in the Incident Report central file

Procedure 3.16

Mandated Reporting Policy

I. Policy Statement

Grantee will have a policy and process in place related to mandated reporting as required by law. Policy should also include training for staff, as needed and understand and follow Mandated Reporting laws of Michigan in suspected cases of child or adult abuse.

II. Key Procedure Steps

In accordance with Michigan Law, all grantee staff should have understood of of mandatory reporting laws. In the cases where grantee employs social service staff or social workers, they will have an understanding of requirements, and grantee will have established policy related to child abuse or neglect, as well as adult abuse or neglect.

III. Regulatory Information

See the “Mandated Reporting Guide” for the State of Michigan.

Procedure 4.1

Calculating Rent (General)

I. Policy Statement

Grantee will establish clear policy for setting and communicating base rent to tenants, as well as how and when increases in the base rent of its units will occur. Rent increases should be communicated to tenants well in advance of increases and be clearly denoted in lease and other policy provided to tenants.

II. Key Procedure Steps

1. Grantee policy will denote how and when rent increases will be reviewed and communicated. For example, if there is an annual 2% rent increase, the policy should indicate when that is implemented, and provide clear steps to communicate changes to tenants.
2. Grantee policy for any rent increases should require communication to tenants including mailing of Rent increase Letter to all applicable tenants.
3. Grantee should have a policy for whose rent might change on a different schedule, or where the actual rent owed may not be raised at all, be raised by a different amount, or be raised later. Examples may include those with vouchers that are subject to the rent reasonableness test, tenants whose rent exceeds the rent cap, or any other specific programs.
4. Grantee should have a clear listing of base rent conditions for all units, regardless of other conditions and funding applied.
5. Grantee should have process for sending out individual rent increase letters for other tenants when their rent will increase. All tenants should be given at least 30 days' notice prior to any rent increase.
6. Grantee should have policy and process for calculating rent for based on various requirements of funders, rental subsidy, or assistance type. As noted above, the base rent for all units must tracked, and then clear documentation of what process applies to which unit(s), including documenting the process which might include:
 - i. Units with LIHTC or other funding requirements
 - ii. Tenants with vouchers or rental assistance
 - iii. Any other class or category that requires a difference rental assistance calculation

DRAFT HOME Rental Policies for Washtenaw Urban County 11-22-21 (adapted from Avalon Housing policies)

Procedure 4.6

Calculating Rent for Over-Income Properties

I. Policy Statement

Grantee should have a clear policy for cases where tenants are over-income. This should be in compliance with HOME policies.

II. Key Procedure Steps

- a. Grantees will often have multiple funding sources for a property and/or given rental unit. Each funding source may have differing requirements for determining income and/or responding to tenants who are over-income. Grantee must understand for each unit the related requirements and follow HOME regulations for HOME-assisted units.
- b. Grantee policy should clarify process for compliance for tenants who are over-income, with a focus on maintaining housing when possible.
- c. In cases where other funding rules conflict with HOME rules for over-income tenants, grantee may ask for a waiver to use other federal or state requirements in lieu of HOME requirements to either Washtenaw County OCED or HUD CPD as appropriate with HOME CFR below.

III. Regulatory Information

HOME Investment Partnership Program - [24 CFR § 92.252 \(I\)](#)

Procedure 4.8

Calculating Maximum Rent and Utility Allowances

I. Policy Statement

Grantee will establish policy and process including specific maximum rents and utility allowances at all HOME-assisted properties for tenants. The specific maximum rent and utility allowance amount may vary by property and sometimes by unit due to the use of multiple state and federal funding sources. The grantee is encouraged to set base rents below the maximum (as Washtenaw County has high rents in general), but as tenant income rises and increases base rent, it is necessary to check the maximum rents to be sure they are not exceeded.

II. Key Procedure Steps

- a. Grantee will determine maximum rents and utility allowance by unit and by tenant (if there is a voucher or rental assistance available).
- b. Grantee shall not exceed HUD-established Fair Market Rents or HOME Rent Limits.
- c. In some cases where HOME funds and LIHTC or other state and federal funds are utilized, MSHDA rents might also be utilized. Grantee should track which standard is being used to calculate maximum rent for each property and unit.
- d. Similarly – grantee should clarify by property, unit, and potentially tenant, the specific utility allowance, if any, with the understanding that this can vary based on funding sources and the use of vouchers, etc.

III. Regulatory Information

- [24 CFR 583.315](#) for Supportive housing Maximum Rent guidelines
- Home Regulations including [Section 92.252](#) for Fair Market Rent Criteria
- Tax Credit Regulations including MSHDA rents

Procedure 4.10

Rent Collection

I. Policy Statement

Grantee will establish standardized process for collecting rent from tenants, recording what has been received and any amounts still owed. All records will be available to the tenant upon request. Grantee should also establish under what circumstances a tenant may negotiate a payment plan.

II. Key Procedure Steps

- a. Prior to signing the lease, Tenant will be provided information on rent collection and relevant policies related to when it is due and any fees.
 - i. Late fees cannot exceed those allowed by HUD and/or any other state/federal funding source applied to the property or unit.
 - ii. Due dates for rent will be indicated clearly on lease and any reminder information shared with the tenants.
- b. Tenant will also receive related policies at the point lease is signed.
- c. Grantee will have established system (which could include the use of software) to track tenant information including correct rental amounts for tenant payments and subsidy payments, if applicable.
- d. Grantee will document rent paid at move-in and have process for tracking and documenting information.
- e. Grantee process for rent collection will indicate the types of payment accepted (check, money order, etc.) and how payment can be executed (mailed, in person, secured drop box, online, etc.)
- f. Grantee will have process for completing and providing a receipt to the tenant, based on the method of payment.
- g. Grantee will have process for recording payments, and set a timeframe for how long between when payment is received, a receipt is provided, and the payment is recorded in the grantee's tracking system.
- h. Grantee has process for securing the payments (in whatever manner received) to ensure they are secure. Grantee will also have a process for regularly depositing funds to again ensure security.
- i. Grantee will have clear process related to collection, tracking and documentation of late fees paid. Note: Grantee should have clear policy communicated to tenants for due dates that fall on non-business days. In those cases, rent cannot be required prior to the actual due date.
- j. Grantee will have a process for determining tenant overpayment or underpayment, and will communicate that well in advance of the next due date, including mailed notice to tenants of over/underpayment, ideally by the 15th of the month.

- k. Grantee will have process for sending out Notices to Quit to tenants who have not paid by a predetermined date of the month (e.g. the 15th), unless other arrangements have been worked out. Repeated late rent payments may require the grantee to issue a Seven-Day Notice. This process should be documented (see Eviction procedure section).
- l. Grantee should have a process in place for a monthly rent report.
- m. Grantee will establish a system to provide checks and balances for reviewing tenants' payments including rent, late fees and other fees, prior to taking action on Notice to Quit or eviction steps. It is preferred that these checks are a party of regular monthly review.
- n. Grantee will have process in place to collect rent in cases the office may be closed due to illness, PTO, or other cases when there is limited staffing.

Procedure 4.11

Security Deposit Calculation and Collection

I. Policy Statement

Grantee will establish a policy for calculating and collecting a Security Deposit. This may include requiring a security deposit equal to one month's rent for each household. Payment of the security deposit will be provided at move-in. A tenant may also negotiate a payment plan with the grantee as grantee policy allows.

II. Key Procedure Steps

- a. Grantee will establish amount for security deposit, for example, equal to one month's rent.
 - i. Policy may further clarify for those with vouchers and other rental assistance, that the tenant may pay the amount equal to the tenant's portion of one month's rent, in cases where voucher or other rental assistance may cover the remainder of the security deposit.
 - ii. In cases where a tenant has zero income, the grantee may establish a policy to delay or waive collection of a security deposit until the tenant has an income and a rent greater than zero.
 - iii. Grantee may establish a policy noting that tenants may receive payment from a third party for all or part of the security deposit. Grantee will maintain records of who paid and who would receive security deposit at move out.
 - iv. Grantee will establish process for documenting payment and receipt of security deposit including who paid, what amount, and any notes if the security deposit was waived and/or delayed payment allowed.
 1. Process should also state method of payment (check, money order, etc.) and how and when payment must be delivered (in person, drop box, online, etc.).
 2. Process will indicate how staff note receipt - including time of payment, how payment is kept secure, and how/when payments are deposited.
 3. Documentation of payment will be included in tenant file and any relevant logs or systems used for tracking of payments.
 4. For delayed payments, Grantee must communicate and document expectation for payment, and track process toward full payment.
 5. Tenants should receive copies of all information including receipts, and information should also be included in tenant files.

Procedure 5.1

Tenant Initiated Notices

I. Policy Statement

Grantee must have clear process for when tenants give notice of moving out, noting that parameters for giving notice will be included in tenant leases.

II. Key Procedure Steps

- a. Grantee will have policy and procedure for when tenant provides notice that they intend to move. Lease will note the amount of time required, usually not more than 30 days' notice.
- b. Request should be documented in the tenant file.
- c. Grantee process should include prorating the rent as necessary.
- d. If tenant provides less than time required per the lease, Grantee should have process in place to address issues such as rent owed, etc.

Procedure 5.2

Move-Out due to Over Income

I. Policy Statement

Grantee should have policy and process for addressing when tenants are over-income, including at what point they may need to move out. Process must comply with HOME guidance related to over-income tenants.

II. Key Procedure Steps

Grantee recertifies household income on an annual basis. Grantee will have clear policy for addressing tenants who are over-income for HOME-assisted units, in compliance with HUD HOME guidelines.

- a. Grantee policy should address various rules based on state and federal funding sources, including HOME, LIHTC, Section 8, etc.
- b. In all cases the policy should require Grantee to notice the household in writing regarding:
 - Income level;
 - Maximum income allowed at the property and/or unit;
 - Any requirements to move out, and the reasonable time period to do so (for example, 6 months);
 - The requirement that they move out within [specified time period] if their income remains at or above this level;
 - Grantee policy may allow Grantee to raise the rent in accordance with the policy and/or funding sources for the property and/or unit;
 - Grantee policy may require grantee to send a Notice to Quit if tenant has not vacated property based on time period designated in required letter;
 - Grantee may have a policy to recertify income multiple times a year in cases where tenant has noted seasonal income, or regular fluctuation in employment that may impact recertification at a specific time of the year.

Procedure 5.3

Unit Abandonment

I. Policy Statement

Grantee will have an established policy and procedure for units that are abandoned. This should be communicated to tenants as part of the lease-up process.

II. Key Procedure Steps

Grantee will establish policy and procedure for identifying a unit as abandoned,

- a. Grantee will have process to notice the tenant through mail, posting on the unit door, and other means to verify if the unit is abandoned.
- b. If Grantee determines, through official process and procedure that the unit has been abandoned, grantee will use policy and process to attempt to notify the tenant and provide adequate time for removal of possessions.
- c. Grantee will follow additional steps related to how and when to utilize security deposit, and to prepare the unit for lease-up as necessary.

Procedure 5.4

Evictions

IV. Policy Statement

Grantee will have established and documented process for evictions, and must follow a consistent process when carrying out evictions.

V. Key Procedure Steps

Grantee will establish process for eviction. Ideally, grantee will also have in place an eviction prevention process which would occur prior.

Grantee process will list out the steps in detail along with timing for each step, and points where tenant can address issue and come into compliance. All steps should comply with HOME rules and guidance and be documented clearly. Those steps may include:

- a. Staff consultation prior to issuing the Notice to Quit.
- b. Staff providing written notice/letter to the tenant explaining the Notice to Quit. Ideally this letter accompanies the Notice to Quit and is done for all evictions. If Grantee has an appeals process, that should be included in the communication to the tenant.
- c. Issues a Notice to Quit. Options include:
 - 7 Day Notice for Unpaid Rent
 - 7 Day Notice for Health and Safety Violations
 - May not be used if the condition has existed for more than 90 days.
 - 30 Day Notice to Quit
 - For terminating a tenancy for cause
- d. Grantee policy should indicate how Notice to Quit is filled out, filed, and communicated to tenant. Staff should fill out the form adequately, which could include the following:
 - Lists all adults on lease, followed by “and all other occupants”;
 - Writes on all 7 Day Notices: “Vacating the Premises will NOT terminate your obligations under your lease and/or your tenancy.”;
 - Writes on all 30 Day Notices: “Acceptance of rent will neither void nor terminate this notice.”;
 - Writes on any 7 Day Notice that is issued in conjunction with a 30 Day Notice: “Payment of the amount in this notice does not in any way affect the notice to terminate tenancy previously served upon you.”;
 - Indicates the reasons for the Notice on the 30 Day Notice;
 - Obtains signature on behalf of owner;
 - Obtains signature of person hand delivering;

- Has notary witness signatures;
 - Makes two copies of notices;
 - Hand delivers remaining originals with accompanying letter to tenant household. If the tenant is not home or not answering the door, affix the envelope including the notice and accompanying letter to the outside of the unit door.;
 - Mails copy of notice and letter to tenant;
 - Files copy of notice and letter to tenant and remaining originals;
 - Maintains tenant file with the notice.
- e. Grantee policy/process will indicate action steps if notice has expired. In that case, grantee may include in the process a step to prepare paperwork to file with attorneys. This may include the following:
- Summary Proceedings Order
 - Original signed and Notarized Notice to Quit
 - Three (3) copies of the Notice to Quit for the first person on the Lease and two (2) copies for each additional person on the lease;
 - Four (4) copies of the Lease for the first person on the Lease and two (2) copies for each additional person on the Lease;
 - Leases (including any addenda) should be stapled.
 - Any letters or other information which have been exchanged between Lessor and Lessee immediately prior to the initiation of legal proceedings, including any information on past NSF checks if notice concerns rent.
- f. Grantee policy and process will include the timeline for filing, court dates, writs and property removal, which may include the following:
- Timing for staff to file with attorneys after expiration of the notice.
 - Timing for the attorney to file with the court allowing the judge to set a date for the hearing.
 - The tenant is notified by the Court of the Hearing Date.
 - The Hearing is held. The judge may either
 - Give tenant additional time, set new date for Hearing
 - Issue a Judgement
 - A judgment against the tenant will generally say they must leave the premises and pay court costs. If the notice was served personally, it should also include rent owed.
 - If the tenant does not return possession of the property within ten days (or timeline stated in the judgment), staff contacts the attorneys office to obtain a Writ of Restitution;
 - The Judge signs the Writ;
 - The attorney contacts the Property Manager to say the Writ has been issued and identifies court officer

- The Property Manager contacts the court officer to arrange service of the Writ (because of the timeline, the Property Manager will try to avoid serving the Writ on Thursdays or Fridays);
- The Court Office posts the Writ on the unit;
- The Tenant generally has at least 24 hours after Writ is posted to voluntarily remove their belongings;
- After the Writ has expired and under the direction of the court officer, the Property Manager and Maintenance Staff remove all belongings to curb;
- After 24 hours, Maintenance Staff will dispose of any items remaining.

Relevant Federal/State/Local/Other Requirements

- Home Regulations, including Section 92.253
- Michigan Compiled Laws (MCL) 600.5701-.5720
- Michigan General Court Rule (MCR) 4.
- LIHTC and/or Section 8 or other rental assistance requirements

Procedure 5.6

Eviction Prevention Process for 30-Day Notices

VI. Policy Statement

Grantee will establish a policy and consistent process in carrying out evictions. Grantee is encouraged to first engage tenants at the first signs that there may be problems and work to prevent evictions wherever possible. In the event that an eviction is unavoidable, following a consistent process improves legal standing and ensures that each case is handled in a fair and consistent manner. The process for 30-day notices may be for non-payment, behavior, or other repeated lease violations.

VII. Key Procedure Steps

Grantee will establish a policy and process for addressing lease violations that are deemed appropriate for a 30-day Notice to Quit. This includes behavior related lease violations (which may be discovered by third party reports, on-call pages, or incident reports) and chronic late payment, etc.

Grantee may determine in the policy, that when a violation has occurred, the Property Manager should check the tenant file to see if there have been previous violations, and if they have occurred within a given timeframe (e.g. 12 months), determine what frequency would signal a need to proceed with the 30-day notice. Grantee policy may have different provisions if tenant did not have previous violations during a specific period (for example 12 months).

Process may include:

- a. Staff has a **verbal conversation** with tenant about the violation. The problem is explained, this process is reviewed, and the conversation documented by the Property Manager writing it up and filing it in the tenant file.
- b. Staff refers the tenant to rental assistance programs or other social services as warranted. In the case of chronic late payment, Grantee may include in the policy such interventions such as a protective payee referral and/or budgeting classes should be discussed with the tenant. A copy of this referral will be sent to the tenant.
- c. The tenant is responsible for contacting any referrals. The tenant has a choice about whether to work with services to address the problem.
- d. Grantee policy may also include a timeframe for the Grantee to send a written **First Warning** to the tenant, informing them that they are required to attend a meeting grantee and particular service provider. The tenant may also bring another support person with them to the meeting. The tenant and their support team will present an

Eviction Prevention Plan or similar written agreement that includes specific steps to be taken by all parties, including Grantee. Everyone signs the plan, and a copy is placed in the tenant's file. Tenant must agree to work with services in order to continue tenancy.

- e. In cases where tenant still remains out of compliance with an eviction prevention plan or similar agreement, the Grantee is encouraged to send a **Final Warning** with the requirement to attend a meeting with Grantee and service providers as necessary. The meeting will likely result in either a signed **Lease Addendum or 30-day Notice**.
- f. In the case of chronic late payment, Grantee may require that a protective payee is integrated into the lease addendum or offered as an alternative to receiving a 30-Day Notice when deemed appropriate.

Procedure 5.7

Return of Security Deposit

I. Policy Statement

Grantee will have established policy and process for determining the amount of the security deposit that can be returned after a tenant moves out.

II. Key Procedure Steps

Grantee policy may include the following:

- a. At or just prior to tenant move-out, Grantee will inform the tenant that it is the tenant's responsibility to provide Grantee with a forwarding address within specific timeframe of their move out. Failure to do so can alter the tenant's legal rights regarding the security deposit process.
- b. Policy and process will delineate who is responsible for determining a move-out has occurred, and the date of the moveout. Process will also indicate:
 - Timeframe for when staff ensures the move-out inspection report is conducted;
 - Staff determines any damage to unit beyond any wear and tear;
 - Staff attributes costs to any damages;
 - Staff documents above and shares with relevant staff and includes in tenant file;
 - Within set period of time after move-out, staff will calculate the amount of security deposit to be returned, if any, by deducting the following from the total security deposit received.
 1. Actual damages not related to normal wear and tear
 2. Unpaid rent
 3. Utility bills that are the responsibility of the tenant and not paid by the tenant.

Note: Policy may note that hauling and cleaning costs cannot be taken out of security deposit.
- c. Completes documentation including tenant name, unit number, security deposit paid, deductions (if any), amount of security deposit to be returned (if any) and to whom the security deposit should be returned, with the address.
- d. Provides the above documentation to staff responsible for returning security deposit. All documentation will also be included in tenant file.
- e. Within timeframe designated in the policy, the check or other means of security deposit should be issued and the security deposit provided to:
 - The Representative Payee, whenever the tenant has a Payee;
 - The agency who paid it, unless the agency informs Grantee otherwise.;

- The tenant, if paid either by the tenant or another individual who is not an official Payee of the tenant.
- f. Within specific period of time after move-out, but no longer than **30 days after move-out**, the appropriate staff sends the tenant a letter that:
- Itemizes any deductions taken from the security deposit
 - Informs tenant if they disagree with the deductions, they have seven (7) days to inform grantee in writing of their disagreement
 - Includes a check for the amount of security deposit to be returned. If the check is being returned to a different entity, the letter to the tenant will indicate this and the reason for it.
 - Includes information on tenant's remaining balance, if any.
- g. If the tenant has not provided grantee with a forwarding address, the appropriate staff will still itemize the deductions and will send the letter to the tenant's last known address. In this event, staff may not include the check itself, but can note the amount of the check and request the tenant contact the grantee to inform them of where to send the check.
- h. If tenant still owes Grantee for any charges once the security deposit has been reconciled, the staff will document charges and fees and notify tenant.

Procedure 6.1

Data Collection and Reporting

I. Policy Statement

Grantee is required to report on HOME- assisted units, along with other local, State, and Federal funders and agencies in order to remain in full compliance.

II. Key Procedure Steps

The following external reporting is required on an annual or semi-annual basis:

- HOME Completion data upon lease up (including tenant demographics, income, head of household, etc.);
- Annual HOME income and rent recertification form;
- Other relevant data, policies and procedures, and other information may be requested by Washtenaw County, and/or HUD CPD as part of regular review and ongoing monitoring.

Procedure 6.3

Tenant Ledger Management

I. Policy Statement

Grantee will maintain an accurate tenant ledger for each tenant that includes charges, credits, payments and the current tenant balance. Tenant ledger management is an important aspect the grantee management function. The grantee policy will indicate what staff is responsible for the accuracy of the tenant ledger. Grantee policy and procedure will describe the types of transactions impacting the tenant ledger and clarify who is responsible for processing the activity. All transactions must be recorded with a current month and date. Tenant ledgers must be available to the tenant by request.

II. Key Procedure Steps

a. **Monthly Tenant Rent and Subsidy Rent Billing:**

Grantee will determine the staff responsible for the accuracy of the scheduled charge for each tenant. That staff must adjust the scheduled charges to reflect increases and decreases in the subsidy and tenant rent. Grantee policy will determine what staff is responsible for performing the tasks that generate the monthly charge transactions on each tenant ledger using the scheduled charges.

b. **Late Fee Charges:**

Grantee will determine the staff responsible for posting late fees on the tenant ledgers at a regular interval each month. Policy will determine staff authorized to waive late fees for tenants that are compliant with the terms of a payment plan.

c. **Tenant Damage Charges:**

Grantee staff is responsible for entering all damage charges on the tenant ledger. All charges must be tracked with supporting documentation for the amount being charged. All documentation of charges must be included in the tenant file and available on request.

III. Other Tenant Charges:

Grantee policy will include any other eligible tenant charges. Examples of other tenant charges include air conditioner fees, maintenance charges, lock out/key fees, trash removal and legal fees.

IV. Tenant Payments:

Grantee policy will indicate staff responsible for recording all tenant payments on the tenant ledger. Payments should be recorded using the date the payment is received.

V. Subsidy Payments:

Grantee policy will designate staff responsible for recording all subsidy payments on the tenant ledger. Payments should be recorded using the date the payment is received. Designated staff will contact the agency that issued the voucher in cases when the subsidy amount paid differs from the standard charge on the tenant subsidy ledger and make any necessary adjustments to the tenant subsidy ledger and scheduled charges.

VI. Credit Transactions:

Grantee policy will designate staff role responsible for entering any credit adjustments on the tenant ledger. Staff will document any charges or credit along with supporting documentation for the amount being credited. Staff will receive appropriate approvals of the transaction. An electronic version of the Tenant Ledger Charge/Credit documentation with supporting documents must be attached to the credit transaction and the original documents must be filed in the correspondence tab of the tenant file.

VII. Monthly check:

Grantee will establish the process for checking on a consistent day each month (potentially the last day of the month) which will include review of charges, credits, various fees, etc. We encourage Grantee to utilize a checklist and/or have a process for tracking different types of charges, credits, fees and other payments, and confirm all items have been processed for the month. Grantee process should allow for each ledger to be updated at the end of each month.