

TENANT SELECTION PLAN
Branford Manor
37 Mather Ave.
Groton, CT 06340

Introduction

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

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

Right to Apply

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

Statement of Non-discrimination

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

- In carrying out this Tenant Section Plan, the Agent will not discriminate on the basis of race, color, creed, religion, national or ethnic origin, citizenship, ancestry, class, sex, sexual orientation, familial status, disability, military/veteran status, source of income, age or other basis prohibited by local, state or federal law in any aspect of tenant selection or matters related to continued occupancy. The Affirmative Fair Marketing Plan establishes the minimum minority occupancy goal for the development based on the percentage of minorities in the area. The agent will also affirmatively market to persons with disabilities, as specified in its Affirmative Fair Marketing Plan.
- Applicants with Disabilities and Reasonable Accommodations - The Agent will make reasonable accommodations in policies or reasonable modification of common or unit premises for all applicants with disabilities (as defined in the above listed Acts or any subsequent

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legislation) who require such changes to have equal access to any aspect of the application process or to the development and its programs and services. The Agent will, for example, arrange for sign language interpreters or other communication aids for interviews during the application process.

Selection Criteria

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

Eligibility will be determined on the following basis:

1. **Maximum Income – Household annual income must not exceed current income limits for the program to which application is made. When determining family size for establishing income eligibility, all persons living in the unit including foster children and foster adults will be included except for live-in aides and guests.**
2. **Other Eligibility Criteria Pursuant to Program Characteristics – Household characteristics, such as the number of family members and/or their ages, must be appropriate to the size of the unit and pursuant to the subsidy program guidelines. In general, a two person per bedroom maximum occupancy standard will be applied. However, additional consideration will be given to households with infants and, if requested, they will be permitted to occupy a smaller unit.**
3. **Selection Criteria Based on the General Requirements of Tenancy (see Attachment 1 for greater detail) -- This Tenant Selection Plan sets forth the essential requirements of tenancy and the grounds on which tenants will be rejected for failing to meet such requirements. Rejection of an applicant is appropriate where the Agent has a reasonable basis to believe that the tenant cannot meet these essential requirements, which may be summarized as follows:**
 - a. to pay rent and other charges under the lease in a timely manner;
 - b. to care for and avoid damaging the unit and common areas, to use facilities and equipment in a reasonable way, and to create no health or safety hazards;
 - c. not to interfere with the rights and enjoyment of others and not to damage the property of others;
 - d. to comply with necessary and reasonable rules and program requirements of the housing provider.
4. **Owner has established standards that prohibit admission of:**
 - a. Any household containing a member(s) who was evicted in the last three years from

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federally assisted housing for drug-related criminal activity. The owner may, but is not required to, consider two exceptions to this provision:

- The evicted household member has successfully completed an approved, supervised drug rehabilitation program; or
 - The circumstances leading to the eviction no longer exist (e.g., the household member no longer resides with the applicant household).
- b. A household in which any member is currently engaged in illegal use of drugs or for which the owner has reasonable cause to believe that a member's illegal use or pattern of illegal use of a drug may interfere with the health, safety, and right to peaceful enjoyment of the property by other residents;
- c. Any household member who is subject to a State sex offender lifetime registration requirement; and
- d. Any household member if there is reasonable cause to believe that member's behavior, from abuse or pattern of abuse of alcohol, may interfere with the health, safety, and right to peaceful enjoyment by other residents. The screening standards must be based on behavior, not the condition of alcoholism or alcohol abuse.

5. An applicant with a history of criminal conviction(s) will always have his/her conviction history individually assessed and will not be denied housing solely as a result of having a conviction(s) on his/her record.

a. The individualized assessment will take into account: the time which has elapsed since the criminal conviction(s); the age of the person at the time of the conviction(s); the seriousness of the conviction(s); and any information produced by the applicant, or produced on his or her behalf, in regard to rehabilitation and good conduct, including but not limited to, evidence of completion of treatment, rehabilitative programming, history of employment and tenancy, volunteer or community activity, and letters of reference from employers, landlords, community members or others who could speak to the person's conduct since the conviction. Note: if, after conducting the assessment, the housing company determines that the household is not eligible, it should be able to articulate its reasoning with specificity.

6. This plan provides for the consideration of mitigating factors that rebut the presumption that an applicant will be unable to meet the requirements of tenancy. Mitigating factors may include a showing of rehabilitation or rehabilitating efforts. Mitigating factors must be balanced against the potentially disqualifying behavior or circumstances. In considering both the disqualifying behavior and mitigating factors, the Agent will determine if there is a reasonable risk that the applicant will be unable to meet the essential requirements of tenancy. Among the factors that should be considered are:

- the severity of the potentially disqualifying conduct;
- the amount of time that has elapsed since the occurrence of such conduct;
- the degree of danger, if any, to the health, safety and security of others or to the security of the property of others or to the physical conditions of the housing development and its common areas if the conduct recurred;
- the disruption, inconvenience, or financial impact that recurrence would cause the

- housing provider; and
- the likelihood that the applicant's behavior in the future will be substantially improved.

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

Eligibility Criteria

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

- eligibility based on income limit restrictions;
- compliance with unit size standards;
- eligibility based on non-citizen restrictions (Section 214 of the Housing & Community Development Act of 1980, as amended);
- Disclosure and verification of a Social Security Number for all applicants and tenants except those individuals who do not contend eligible immigration status or tenants who are age 62 or older as of January 31, 2010, and whose initial eligibility began prior to January 31, 2010.
- eligibility based on the student status of household members

Income Limits:

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

- This development applies the low or very low income limits as published by HUD to determine income eligibility. In addition, all move-ins are subject to the extremely low-income requirements as outlined on pg. 17 of this plan under *Project Specific Requirements – Income Targeting*.

This development is also administered under Low Income Housing Tax Credit Program (LIHTC) in accordance with IRS regulations and the following additional eligibility requirements apply:

- This development applies 50% AMI, 60% AMI income limit(s) to determine income eligibility of applicant households.

Unit Size Standards:

To determine compliance with unit size standards, the Agent will follow HUD occupancy guidelines

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that take into account the size and number of bedrooms needed based on the number of people in the household. Occupancy standards serve to prevent over- or under-utilization of units that can result in an inefficient use of housing assistance. Occupancy standards also ensure that tenants are treated fairly and consistently and receive adequate housing space. In general, a two person per bedroom maximum occupancy standard will be applied. However, additional consideration will be given to households with an infant. If an applicant household includes an unborn child or child under the age of 2 years old, then this household may be assigned a smaller unit or placed on this unit's waiting list if it is requested by the applicant household.

Citizenship Restrictions

All applicants are required to complete the Citizenship declaration of 214 status as well as a family summary sheet. For those claiming US Citizenship, this is confirmed through review of birth certificates, US passports or other eligibility documents.

Non-Citizen Restrictions

To determine eligibility based non-citizen status, the Agent will process the following documents for all family members including foster children and foster adults: family summary sheets, declaration of citizen status, and verification consent forms, as required.

- For a family member who chooses not to claim eligible citizenship status, no proof or verification is required.
- For a family member who claims eligible non-citizen status, an original DHS document (a list of acceptable forms can be found in the 4350.3, Figure 3-4) and verification consent form is to be obtained. This member's eligibility status must be verified through the Systematic Alien Verification for Entitlements (SAVE) web-based program, DHS' automated system. If eligibility status is not verified, the Agent must notify the applicant household and discuss options available to the household and their right to appeal the decision to the DHS and/or hold an informal meeting with the owner.
- Applicants must submit required documentation of citizenship/immigration status no later than the date management initiates verification of eligibility factors. If the applicant cannot supply the documentation within 14 days, management may grant the applicant an extension of not more than 30 days, but only if the applicant certifies that the documentation is temporarily unavailable and additional time is needed to collect and submit the required documentation. Although the extension period may not exceed 30 days, management may establish a shorter extension period based on the circumstances of the individual case.
- Appeals to DHS should be addressed to:
Federal Building
970 Broad Street
Newark, NJ 07102
Attention: Immigration Status Verifier
- For a family member 62 years of age or older who claims eligible non-citizen status, a signed declaration of eligible non-citizen status and proof of age is to be obtained. Non-

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citizen status is not required to be verified by the DHS.

Social Security Number Disclosure

To determine eligibility based on Social Security numbers, the head of the applicant household/spouse/co-head must disclose SSNs for all household members including live-in aides, foster children and foster adults except those individuals who do not contend eligible immigration status or tenants who are age 62 or older as of January 31, 2010, and whose initial eligibility began prior to January 31, 2010. When determining the eligibility of an individual who meets the exception requirements for SSN disclosure and verification, documentation must be obtained from the owner of the property where the initial determination of eligibility was determined prior to January 31, 2010, that verifies the applicant's exemption status. This documentation must be retained in the tenant file. An O/A must not accept a certification from the applicant stating they qualify for the exemption. If no SSN has been assigned to a particular applicant household member, the household will not be eligible for tenancy. An applicant who has not disclosed and/or provided verification of SSNs for all non-exempt household members has 90 days from the date they are first offered an available unit to disclose and/or verify the SSNs. During this 90-day period, the applicant may, at its discretion, retain its place on the waiting list. After 90 days, if the applicant is unable to disclose and/or verify the SSNs of all non-exempt household members, the applicant should be determined ineligible and removed from the waiting list. When a tenant requests to add a household member who is age six or older, the documentation of the SSN for the new household member, must be provided to the O/A at the time of the request or at the time the recertification that includes the new household member is processed. The O/A must not add the new household member until such time as the documentation is provided. When adding a household member who is a child under the age of six with a SSN, the child's SSN must be disclosed and verification provided at the time of processing the recertification of family composition that includes the new household member. If the child does not have a SSN, the O/A must give the household 90 days in which to provide documentation of a SSN for the child. An additional 90-day period must be granted by the O/A if the failure to provide documentation of a SSN is due to circumstances that are outside the control of the tenant. Examples include but are not limited to: delayed processing of the SSN application by the SSA, natural disaster, fire, death in family, etc. During this time period, the child is to be included as part of the household and will receive all of the benefits of the program in which the tenant is involved, including the dependent deduction. Subject to the exemptions allowed, current households may lose its tenancy if one member of the household does not comply with the SSN disclosure requirements

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

When Under the Age of Six without an assigned SSN, the tenant must disclose and provide verification of the new household member's SSN within 90 calendar days of the child being added to the household. The owner must grant an extension of one additional 90-day period, if the owner, in its discretion, determines that the tenant's failure to comply is due to circumstances that could not have been foreseen and were outside the control of the tenant, e.g., delay in processing by

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SSA, natural disaster, fire, death in family, etc). In HUD Assisted communities, during the period that the owner is awaiting disclosure and verification of the SSN, the child is included as part of the household and shall be entitled to all of the benefits of being a household member, including the dependent deduction. A TRACS ID will be assigned to the child until the time the SSN is provided. At the time of the disclosure of the SSN, an interim recertification must be processed changing the child's TRACS ID to the child's verified SSN. If, upon expiration of the provided time period, the tenant fails to disclose and provide verification of the SSN, the tenant and the tenant's household are subject to termination of tenancy. The owner shall follow the guidance in Paragraph 8-13.A.6 to terminate the household's tenancy.

Student Status Restrictions- Section 8

To be eligible for Section 8 Assistance, any adult who attends an institute of higher learning (full or part-time) for the purpose of obtaining a degree, certificate, or other program leading to a

recognized educational credential must be one of the following:

1. A dependent of the household
2. 24 and older
3. A Veteran of the United States Military
4. Married
5. A parent with dependent child(ren)
6. Living with his or her parents currently receiving Section 8 assistance;
7. A disabled individual who was receiving assistance prior to November 30, 2005;
8. Independent from parents;
9. Have parents who are income eligible for Section 8 assistance and is individually eligible to receive Section 8 assistance

For a student to be eligible independent of his or her parents (where the income of the parents is not relevant), the student must demonstrate the absence of, or his or her independence from, parents. While owners may use additional criteria for determining the student's independence from parents, owners must use, and the student must meet, at a minimum all of the following criteria to be eligible for Section 8 assistance. The student is defined as one of the following:

1. Is at least 24 years old by December 31 of the year in which the student applies to get or keep Section 8 Assistance.
2. Is married or
3. Is a veteran of the U.S. Armed Forces or is currently serving on active duty in the Armed Forces for other than training purposes or
4. Has legal dependents other than a spouse (for example, children or an elderly parent) or
5. Is a person with disabilities who was receiving Section 8 assistance as of November 2005 or
6. Is a graduate or professional student or
7. Is an independent student or
8. Classified as a Vulnerable Youth
9. Is a student from who a financial aid administrator makes a documented determination of independence by reason of unusual circumstances or

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10. Has parents who are income eligible for the Section 8 program and is individually eligible to receive Section 8 assistance. The parents may sign a declaration and certification of income. They must be below the HUD low income limit. The low income limit that will be used:
 - If parents live in the U.S.—income limit for the country that the parents live in.
 - If parents live outside the U.S.—limit where the property is located.

An owner may verify further (tax returns, etc.) if the parents certification is questionable. The student is not eligible if the parents refuse to provide a:

1. Declaration of their income, AND
2. Statement of whether they provide student financial assistance or not.

Independent Student defined as:

- a. The individual is 24 years of age or older by December 31 of the award year;
- b. The individual is an orphan, in foster care, or a ward of the court or was an orphan, in foster care or a ward of the court any time when the individual was 13 years of age or older;
- c. The individual is, or was immediately prior to attaining the age of majority, an emaciated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's state of legal residence.

Vulnerable Youth - HUD's definition:

- a. The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth(as such terms are defined in Section 725 of the McKinney-Vento Homeless agency Assistance Act), or as unaccompanied youth, at risk of homelessness and self-supporting, by
- b. A local educational agency homeless liaison, designated pursuant to the McKinney – Vento Homeless Assistance Act;
- c. The director of a program funded under subtitle B of title V of the McKinney-Vento Homeless Assistance Act or a designee of the director or
- d. A financial aid administrator.

For eligible students receiving Section 8 assistance, all financial assistance a student receives (1) under the Higher Education Act of 1965, (2) from private sources, or (3) from an institution of higher education that is in excess of amounts received for tuition is included in annual income except if the student is over the age of 23 with dependent children or the student is living with his or her parents who are receiving Section 8 assistance.

In a household composed of several individuals including a student that does not meet any one of the criteria and is not otherwise eligible, assistance is denied or terminated as long as the ineligible student remains in the household. Assistance will not be prorated.

A determination of the eligibility of students to receive Section 8 assistance will be made at move-in, initial certification, annual recertification and at the time of interim recertification if one of the family composition changes reported is that a household member has enrolled as a student.

Student Status Restrictions – LIHTC

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

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

Violence Against Women Act (VAWA)

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

The law also creates emergency transfer options for victims and their affiliates, allowing survivors to transfer to a different unit if they are in fear for their life or safety, and provides for bifurcation of the lease to allow for an abuser to be removed and the victim and other household members to remain in the unit even if for a period of time. In addition:

- HUD requires that a VAWA notice and certification forms be provided to (1) all applicants at move-in (2) applicants at the time of denial of housing, (3) to each household in the event that eviction or termination of assistance actions are commenced against the household no matter the reason – i.e. arrears. Tenants must sign the VAWA lease addendum, form HUD-91067.
- An applicant's status as a victim of domestic violence is not a basis for denial of rental assistance or for denial of admission if the applicant otherwise qualifies for assistance and admission. If an applicant is living in a shelter for victims of domestic violence and

crimes protected under VAWA, we may accept verification of this in lieu of additional landlord verification.

- Being a victim of a VAWA crime is not a reason to change the eligibility or applicant screening requirements or to waive the requirements of the HUD Model Lease or other lease unless such requirements interfere with the protections provided under VAWA.
- VAWA 2013 does not limit an owner's agent's right to terminate assistance/tenancy for any violation that is not related to a VAWA crime. However, the owner/agent must not subject the victim or a person affiliated with the victim to a more demanding standard than other residents when determining whether to terminate assistance/tenancy.
- VAWA does not limit an owner/agent's right to terminate assistance/tenancy if the owner/agent can demonstrate an actual and imminent threat would be present if that resident or lawful occupant is not terminated. An actual and imminent threat is a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. The threat would be to other tenants, employees of the property, or to vendors providing services at the site.
- An incident or incidents of actual or threatened domestic violence will not be taken as serious or repeated violations of the lease or other "good cause" for terminating the assistance, tenancy, or occupancy rights of a victim of abuse.
- Assistance may be terminated or a lease bifurcated (divided) in order to remove an offending household member from the home. Whether or not the individual is a signatory to the lease and lawful tenant, if he/she engages in a criminal act of physical violence against household/family members or others, he/she stands to be evicted, removed, or have his/her occupancy rights terminated. This action is taken while allowing the victim, who is a tenant or a lawful occupant, to remain. Eviction or termination action against individuals must be in accordance with procedures prescribed by federal, state, and local law.
- In the event that one household member is removed from the unit because he/she engaged in acts of domestic violence, an interim recertification must be processed by staff in a timely manner and in accordance with HUD regulations to reflect the change in household composition. Note: at sites that do not have interim recertifications (i.e. straight tax credit sites), a bifurcated lease addendum must be provided.
 - As regards VAWA lease bifurcation: it does not matter if the household member is a signatory on the lease. Bifurcation must be carried out in accordance with Federal, State or local laws. The remaining members must be given 90 calendar days from the date of bifurcation to:
 - establish eligibility under the covered program; or
 - establish eligibility under another covered program; or
 - find alternative housing.

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The tenant may be given up to an additional 60 days if allowed by the program.

- VAWA does not require an owner/agent to request that an individual seeking VAWA protections submit documentation of the status of the individual as a victim of domestic violence, dating violence, sexual assault or stalking, however, if such a request is made provide the applicant or resident with a copy of the VAWA Certification form to fill out and process accordingly. Further, at least 14 days must be provided from the date of the request for completion by the applicant/resident.
- Owners/agents may accept the following in lieu of the certification form: a document signed by an employee, agent or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault or stalking or the effects of abuse; a document signed by the applicant or resident and that specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection; a record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or, at the discretion of the housing provider, a statement or other evidence provided by the applicant or resident.
- Residents or applicants who are victims of VAWA crimes may request a VAWA accommodation or an emergency transfer and should be provided with HUD-5383 (VET Request) form to fill out.
- Staff must retain all documentation relating to an individual's domestic violence, dating violence, sexual assault, or stalking in a **separate file** that is kept in a secure location. **Important note: this documentation must not be incorporated into the standard applicant or resident file for the household.**
- The identity of the victim and all information provided to owners relating to the incident(s) of domestic violence, dating violence, dating violence, or stalking must be retained in confidence by the owner and must not be entered into any shared database or provided to a related entity except to the extent that the disclosure is:
 - Requested or consented to by the individual in writing;
 - Required for use in an eviction proceeding; or
 - Otherwise required by applicable law

Application to Housing

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

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

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

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

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

It is the policy of the Agent to guard the privacy of individuals in accordance with the Federal Privacy Act of 1974 and applicable state laws, and to ensure the protection of records maintained by the property concerning the applicants or tenants.

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

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

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

Application Processing

Applications will be accepted only if they are completed on original Related Management forms and bear the original signature of the head of household. Applicants may submit applications in person at the site's management office, by mailing them to the site's management office, or in accordance with specific requirements of the site's re-marketing plan that will be stated in the outreach.

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

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

- Review for completeness - Applications will first be reviewed for completeness. Incomplete applications will be returned to the applicant and will not be evaluated until the application is returned to the Agent with all required information.
- Preliminary determination of program ineligibility - Completed applications will be reviewed for income eligibility and compliance with any categorical eligibility requirements such as age or disability, if applicable. Applications determined ineligible, pursuant to program guidelines, will be rejected in accordance with procedures outlined above.
- Preliminary determination of program eligibility - When there are more applicants on the waiting list than units currently available, the Agent will make a preliminary determination of eligibility, based on the applicant's self-certified statement as to his or her income, assets, age, disability status, and preference or priority status. Applicant will be notified of the status of his/her application.
- Ineligible Applicants- If an applicant household is determined to be ineligible, no new applications from the household will be accepted for six months after the date of ineligibility determination.
- Waiting list placement - Once a fully completed application is determined to meet income eligibility requirements and the household composition is determined appropriate for a unit at the development, the applicant will be placed on the appropriate waiting list(s). Applicants eligible for accessible units may choose to be on lists for accessible and standard units. Assignment to a position on the waiting list will be based on this preliminary determination and will be formally verified as the applicant's name advances on the waiting list. The applicant will be placed on the waiting list, by date of receipt, within the correct preference category, where applicable.

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- Formal verification – If, subsequent to the preliminary determination of eligibility, the Agent determines that the formal verification of income, assets, or claimed priority status differs from the applicant’s self-certification, the applicant may be:
 - reassigned to another waiting list, i.e., smaller or larger bedroom size;
 - reassigned to a different preference status; or
 - determined to be ineligible.

Screening Procedures

1. Screening Process

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

- references from landlords in the last two years or from the last two successive tenancies, whichever is more inclusive;
- record of prior criminal history;
- references from a credit bureau;
- verification of income either from a present employer, appropriate agency, financial institution or other appropriate party.
- verification of a disability from an applicable professional when the applicant requests an accessible unit, modification to a unit, eligibility for a preference based on disability status, or a reasonable accommodation. Inquiries concerning a person’s disability or disabilities in this regard will be limited to verification of the disability and the need for an accommodation or specific design features of a unit, or to verify the qualification for a program. The Agent will not make inquiries regarding an applicant’s ability to comply with the terms of the lease, including caring for the unit, unless past tenancy history or other evidence suggests that applicant is unable to satisfy some term of the lease.
- For HUD assisted communities, Enterprise Income Verification (EIV) Existing Tenant Search must be run at the time of application processing for all household members including minors, live-in aides, foster children and foster adults to determine if applicants are currently residing at another Multifamily Housing or Public and Indian Housing (PIH) location. EIV will query both the TRACS and IMS (PIC) databases. The report gives the owners the ability to coordinate move-out and move-in dates with the owners of the property at the other location. If the applicant is residing at another location:
 - a. Site staff should discuss this specific situation with the applicant, giving the applicant the opportunity to explain any circumstances relative to his/her being assisted at another location. This may be a case where the applicant wants to move from their existing location.

- b. Site staff will follow-up with the respective PHA or O/A to confirm the individual's program participation status before admission as well as verifying that notice has been given to coincide with applicants proposed move in date.

2. Mitigating Circumstances

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

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

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

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

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

An applicant's ability and willingness to pay rent must be demonstrated through an identifiable source of sufficient income to pay rent and prior rental history. The lack of credit

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history, as opposed to poor credit history, is not sufficient justification to reject an applicant.

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

3. Prohibited Screening Criteria

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

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

Drug-Free Housing

Management is committed to aiding and supporting drug-free housing; and Medical Marijuana - Categorized as a Schedule 1 substance under The Controlled Substances Act (CSA) and therefore the manufacture, distribution, or possession of marijuana is a federal criminal offense. Because the CSA prohibits all forms of marijuana use, the use of "medical marijuana" is illegal under federal law even if it is permitted under state law, the controlling authority being Section 577 of the Quality Housing and Work Responsibility Act of 1998 (QHW RA). Pursuant to QHW RA, Owner and/or Management will deny admission to this community to any household with a member who is determined, at the time of application for admission, to be illegally using a controlled substance, e.g. marijuana.

Rejection of Application

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

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applicant's disability.

Rejection Appeal Meetings

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

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

Population Served

This site provides Family Housing.

- Family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:
 - (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or
 - (2) A group of persons residing together and such group includes, but is not limited to:
 - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - (ii) An elderly family;
 - (iii) A near-elderly family;
 - (iv) A disabled family;
 - (v) A displaced family; and
 - (vi) The remaining member of a tenant family.

Project Specific Requirements - Local Preference

This site does not apply any local preferences.

Project Specific Requirements – Income Targeting Requirements

For developments assisted under a contract for project-based Section 8 assistance, the owner must lease not less than 40% of the units assisted under the contract that become available for occupancy in a calendar year to extremely low-income (ELI) households. As of July 1, 2014, extremely low-income households are now defined whose incomes do not exceed the higher of: The Federal Poverty Level OR 30 percent of Area Median Income.

After every move-in during the calendar year, management staff must determine whether or not the next move-in is required to be an ELI household. A spreadsheet designed solely for this

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purpose has been developed by the Agent and will track ELI status on an on-going basis.

Management staff must always process the next eligible applicant household in accordance with the tenant selection plan and any applicable preference system. The only exception to this process should occur when the ELI spreadsheet identifies that the next move-in is required to be an ELI household and the next applicant is not ELI-qualified. In this case, management staff should process the next ELI-qualified household regardless of their position on the waiting list.

Preference Order

The preferences shall be applied in the following order:

- Internal transfers (as discussed in *Transfers for Existing Residents*)
- Qualified applicants with disabilities who require the specific features of accessible units

Waiting Lists

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

- Waiting lists will be maintained as an electronic file. A printed copy of the waiting lists will be printed monthly and maintained as a historical record. The time and date of the printout will appear on the report file.
- Waiting lists will be organized by type of unit. "Type of unit" may be defined in several ways, including:
 - the number of bedrooms
 - the physical characteristics of the unit, such as accessible features.
 - the type of subsidy attached to the unit, such as project-based subsidy.
- Each applicant must be placed on the appropriate waiting list(s) chronologically according to the date of the completed application within the applicable preference categories. Non-preference applicants shall be placed on the waiting list per the date of the completed application.
- If the applicant responds to and rejects the first unit offer in the required timeframe, the applicant will retain their position at the top of the waiting list. In order to avoid offering another unit shortly after the first offer was reject when applicant circumstances may not have changed, the second offer will be no less than 90 days from the first offer. The applicant has the right to request a timeframe other than the minimum 90 days from the first offer and should do so in writing. If an applicant responds to and rejects the second unit offer, they will be removed from the waiting list and will need to reapply.
- If an applicant is eligible for tenancy, but no appropriately sized unit is available, the Agent will place the family on a waiting list for the development. Households that are eligible for more than one size of unit (by bedroom size) may choose to be placed on multiple waiting lists as

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appropriate and The Agent will respect the bedroom size option chosen by the applicant unless such choice is contrary to the development's occupancy standard. Persons using a wheelchair or requiring similar accommodations may apply for a standard unit, as well as an accessible unit, at their discretion.

- The Agent's records will indicate the date the applicant is placed on the waiting list. All applicant file records, including the application, must be retained for a period of three (3) years.
- Agent will require applicants to contact the project every six months to remain on the waiting list. Upon failure to respond to the Agent's notice to contact the project, the applicant may be removed from the waiting list.
- Waiting lists will be closed to ensure that the wait for a unit does not become excessive. When the decision is made to close the waiting list, the Agent will publish a notice to that effect in a publication likely to be read by potential applicants. Announcements will be compliance with the approved Affirmative Fair Housing Marketing Plan (AFHMP).
- When an applicant pool is no longer adequate due to the closure of the waiting list, the list shall be re-opened. The agent will publish a notice to that effect in a publication likely to be read by potential applicants and provide additional information for applying. Announcements will be compliance with the approved AFHMP.

Transfer Procedure for Existing Residents

In filling vacancies, the Owner shall process current residents from the internal transfer list on an alternating basis with applicants on the external waiting list.

The internal transfer list will consist of transfers for reasons listed below.

Site staff will typically become aware of the need for transfer:

- by remaining aware of the household size/composition of the residents (which should be regularly reviewed/confirmed at the time of each annual or interim recertification)
- by receiving an actual request from the resident him/herself

A transfer list should be maintained in the appropriate order based on the following priority guidelines:

- Those households requiring/requesting a transfer because of a disability under the Section 504/Reasonable Accommodation program or an emergency transfer under VAWA will take priority over other transfers based on household size/composition. The Owner will pay for a Tenant's move based on a reasonable accommodation transfer for medical reasons or disability.
- Those households requiring transfer because of a change in household size and/or composition. Such requests will be granted only in the case of the change causing over or under utilization of units. If a change in household composition does not lead to the household no longer qualifying for the current unit size but the household requests a transfer, such request

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would not be treated as a transfer but as a new application on the waitlist without existing resident transfer preference.

- Those households who requested a smaller unit to gain earlier admission to the property because of smaller unit availability will take low priority on the transfer list. (Example: a two person household that qualified for a 2-bedroom unit requests a 1-bedroom unit because the waiting list is shorter.) Such situation must be documented at move in. Additionally, those households who requested a smaller unit in order to gain earlier admission to the property must complete their initial lease term in the smaller unit before they will be considered for a transfer to a larger unit, unless other circumstances warrant a transfer prior to the end of the term.
- For LIHTC eligible residents, a transfer to the same size unit would not result in the payment of a higher rent. However, the new unit would still be subject to approved annual rent increases for the site.

Unit Inspections

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

Ongoing Eligibility

Once moved in to the property, residents must continue to meet eligibility requirements of the programs.

Management will take into consideration any lease violations, visits from law enforcement and disturbances that interfere with the quiet enjoyment of other residents at the property.

Conclusion

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

Attachment 1

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

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

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Owner's Selection/Rejection Screening Procedures and Documentation

1. Inability or unwillingness to care for the unit.

Procedure:

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

Documentation:

- Previous/current landlord verification form
- Credit bureau report

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

Procedure:

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

Documentation:

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

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

Procedure:

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

Documentation:

- Interview data record
- Verification and other information
- Credit and investigator's reports

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

4. History of drug abuse and other criminal activity, subject to local and state regulations.

Procedure:

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

Documentation:

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