

**ELDER SERVICES, INC./ANCHORAGE SENIOR LIVING, INC./
JEWEL LAKE SENIOR HOUSING, INC./SENIOR LIVING
ALTERNATIVES, INC./SULLIVAN SENIOR HOUSING,
INC./INDEPENDENCE PARK SENIOR HOUSING, INC./
INDEPENDENCE PARK II SENIOR HOUSING, INC.
CRITERIA FOR RESIDENCY
TENANT SELECTION PLAN**

Muldoon Manor/Commodore Park Plaza/Jewel Lake Plaza/Russian Jack Manor/George Sullivan Manor/Independence Park Manor/ Independence Park Manor II provide housing for elderly persons without regard to race, creed, color, familial status, religion, handicap, national origin, disability or gender. Low-income subsidies are available.

The guidelines stated below are intended to be used for determining who can be admitted and who can continue to reside after admission.

ELIGIBILITY

1. A resident must be sixty-two (62) years of age or older or be living with a spouse who is.
2. A resident must meet income guidelines as set forth by US Department of Housing & Urban Development.
3. Muldoon Manor, Commodore Park Plaza, Jewel Lake Plaza, Russian Jack Manor, George Sullivan Manor, Independence Park Manor & Independence Park Manor II are a 100% tobacco free buildings. At Muldoon Manor, Jewel Lake Plaza, Russian Jack Manor, George Sullivan Manor, Independence Park Manor & Independence Park Manor II residents must be non-smokers. At Commodore Park Plaza residents are permitted to smoke outside the building, but the building is 100% tobacco free.
4. A resident must conduct himself/herself in a manner which does not threaten the health and safety of other residents, staff or the facility itself.
5. Applicants must disclose social security numbers (SSN) for all household members and must provide HUD acceptable documentation of social security number as outlined in SSN Requirements in this Plan.
6. All adults in each family must sign an Authorization for Release of Information prior to receiving assistance and annually thereafter.

7. The unit for which the family is applying must be the family's only residence.
8. Applicant(s) agrees to pay the rent required under the program.
9. Applicant must provide acceptable documentation for the following: proof of age and photo identification (these items will be photocopied and retained as part of this application).
10. Applicant income must not exceed very-low income eligibility requirements as established by HUD.
11. All information reported is subject to verification prior to acceptance to the wait list, prior to the unit offer, prior to completion of the lease, and during tenancy.

OCCUPANCY STANDARDS

1 bedroom units will be limited to two persons per bedroom maximum. Therefore, applicants will be limited to two-party households or less.

HEAD OF HOUSEHOLD DESIGNATION

Households with **2 or more adult members**, must designate one adult as Head of Household. Additional adults must be designated a status, **based on their relationship to the Head**. All adults will be defined under the following relationship codes, which are required by HUD for subsidy tracking:

- H** - Head
- S** - Spouse (There either can be a spouse or co-head, but not both.)*
- K** - Co-head
- D** - Dependent
 - 18 or older and disabled or a full-time student.
 - Full-time student (regardless of age) away at school but lives with family during school breaks
- O** - Other Adult Member
 - Adult who is not the head, spouse or co-head and whose income is counted in determining the family's annual income.

Please select S, K, D, or O for all adults.

* Couples in a spousal relationship, regardless of legal marital status or gender, should designate a Head and Spouse. It is presumed that couples will require a one-bedroom unit (or one bedroom in a multiple bedroom units, if there are other household members), unless a reasonable accommodation request is received, based on a qualifying disability, for an additional bedroom assignment.

APPLICATION PROCESSING

An applicant for residency at Muldoon Manor, Commodore Park Plaza, Jewel Lake Plaza, Russian Jack Manor, George Sullivan Manor, Independence Park Manor and/or Independence Park Manor II must provide the following information prior to being accepted for residency:

1.) A completed and signed Application for Residency including social security card (See SSN Requirements) and photo identification is required and will be photocopied and retained as a part of the application);

2.) Authorization(s) for release of information.

Once received, all materials will be evaluated and inquiries made which include any and/or all of the following: Prior Tenant History, Criminal History, Public Records, Verification of Information and Credit History. The final decision as to an applicant's eligibility will be made by the Administration. In event that an applicant is rejected, the applicant shall have fourteen (14) days to respond in writing or to request a meeting to discuss the rejection. Responses may be directed to Patrick C. O'Toole, 1625 Southeast Lafayette Street, Portland, Oregon 97202-3862 or to HUD Area Director, 3000 C Street, Suite 401, Anchorage, Alaska 99503. When an applicant is rejected, more detailed information concerning these appeal rights will be furnished at the time of rejection.

The application process is as follows:

1. Application issued to anyone requesting one. They can be given or sent.
2. Application completed and returned. Complete application is dated (date and time) when received.
3. Wait list review is done.
 - a. Age of applicant (elderly status)
 - b. References
 - c. Prior tenant history (landlord reference)
 - d. Criminal history
4. Accepted to wait list or rejected (see Screening Criteria).
 - a. NOTE: Acceptance to the wait list does not guarantee tenancy or unit offer.
5. Rejected application to legal for review and rejection letter with appeal rights included.
6. Application advances to top of list according to date/time and preferences.
7. Occupancy review/assessment is done.
 - a. Criminal and credit ordered and received.

8. Applicant approved or rejected for unit offer (See Screening Criteria).
9. Contact applicant.
 - a. Phone contact – at least 1 attempts on 3 separate days at varied times and if phone contact is not made
 - b. Written notification – allow seven days for response.
 - c. NOTE: If applicant fails to respond to either contact, they will be removed from the Wait List.
10. Acceptance by applicant: move-in date and interview scheduled.

WAITING LIST POLICY

Each site maintains two waiting lists for residency. The first list is for handicapped-accessible units. We attempt to ensure that accessible units are occupied by persons who will benefit from the handicapped-accessible design features. The second list is for non-accessible units.

When no mobility-impaired persons are on the waiting list for accessible units, families will be admitted to a handicapped-accessible unit that becomes available. In general, one's place on the waiting list is determined by the date and time on which all application materials are received at the office; however, acceptance to the waiting list does not automatically guarantee eligibility for an apartment. An applicant may designate the facility in which he or she wishes to reside. Apartments are rented to eligible persons in the order of receipt; however, occupancy standards and preferential treatment are applied to certain persons who meet one or more of the criteria set forth below.

Preferences are applied only after a determination of initial eligibility under the applicable admissions criteria.

An offer of an apartment will be made by telephone and, if necessary, by letter. A person offered an apartment has three (3) days from receipt of the phone call or, if notified by letter, seven (7) days from the date of mailing to notify the office of their intention to accept or reject the offered apartment. Any deviation from this time-frame must be approved in writing by Administration.

Wait list closure: The owner reserves the right to close the wait list when the owner's estimate the wait list exceeds sixty (60) months. It would reopen the list when placement estimates fall below thirty-six (36) months.

Any eligible person who refuses an apartment will not lose his or her place on the waiting list.

PREFERENCES

- 1.) Mobility-impaired persons who meet the definition of "handicapped" who already reside at Muldoon Manor, Commodore Park Plaza, Jewel Lake Plaza, Russian Jack Manor, George Sullivan Manor, Independence Park Manor and/or Independence Park Manor II and who do not have a unit designed for handicapped occupants receive preference over non-resident applicants for such units. See Unit Transfers.
- 2.) Mobility-impaired persons who meet the definition of "handicapped" receive preference for units designed for handicapped occupants.
- 3.) Unit Transfers (see Unit Transfers next section).

Preferences can be cumulative and will supersede date and time placement on the wait list.

UNIT TRANSFERS

We allow for unit transfers for the following reasons:

- 1.) As a reasonable accommodation (See Reasonable Accommodation below). This request should be issued in writing. If you are unable to provide the request in writing, contact, please notify management for assistance as possible.
- 2.) Medical necessity. Medical requests should be accompanied by a letter/documentation from a medical professional.
- 3.) As an accommodation to an individual needing the benefit of a accessible unit designed for handicap/disability, a non-disabled person occupying that unit will sign an acknowledgement upon move-in and will be required to transfer to the next available unit should another resident or applicant request that accommodation.

Both reasonable accommodation and medical necessary requests must demonstrate: a.) a identifiable relationship, or nexus, between the requested accommodation and the individual's disability and b.) a benefit to the applicant to participate in the program, live in a dwelling, or to take advantage of the program services. Both also must not present an undue financial and/or administrative burden nor result in a fundamental alteration of the nature of the program.

Upon approval of a transfer request, those individuals in residence shall be given a preference to the next applicable available unit over non-resident applicants and in applicable chronological order with other residents requesting the same reasonable accommodations (units designed for mobility-impaired persons). The approved transfer request preference shall be applied to all properties as will a request for reasonable accommodation by an applicant for a mobility-impaired unit.

REASONABLE ACCOMODATION

A Reasonable Accommodation is a change, exception, or adjustment to a program, service, building, dwelling unit, or workplace that will allow a person with disability to participate in the program, to live in a dwelling unit, to take advantage of the program services, or to perform a job.

A Reasonable Accommodation request should be issued in writing. If you are unable to provide the request in writing, please notify management for assistance as possible.

A reasonable accommodation request must demonstrate: a.) a identifiable relationship, or nexus, between the requested accommodation and the individual's disability and b.) a benefit to the applicant to participate in the program, live in a dwelling, or to take advantage of the program services.

Preference on an approved request for reasonable accommodation by a current resident or an applicant for a mobility-impaired accessible unit shall be applied to all properties.

Management may reject a Reasonable Accommodation request if it presents an undue financial and/or administrative burden or results in a fundamental alteration of the nature of the program. Management reserves the right to propose alternative accommodations based upon availability.

We maintain a Reasonable Accommodation Policy. We will be happy to supply a copy upon request.

ELECTRONIC INCOME VERIFICATION (EIV) SCREENING

HUD provides the owner/agent with information about an applicant's current status as a HUD housing assistance recipient. The owner/agent will use the Enterprise Income Verification System (EIV) to determine if the applicant or any member of the applicant household is currently receiving HUD assistance. Nothing prohibits a HUD housing assistance recipient from applying to this property. The applicant must move out of the current property and/or forfeit any voucher before HUD assistance on this property will begin.

If the applicant or any member of the applicant household fails to fully and accurately disclose rental history, the application may be denied based on the applicant's "misrepresentation" of information.

This information will be reviewed on an annual basis, at each annual certification. If any household member receives or attempts to receive assistance in another HUD assisted unit while receiving assistance on this property, the household member will be required to

reimburse HUD for assistance paid in error. This is considered a material lease violation and may result in penalties up to and including eviction and pursuit of fraud charges.

SOCIAL SECURITY NUMBER (SSN) REQUIREMENTS

Effective January 31, 2010, all household members must provide:

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

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

- A household member is 62 or older as of January 31, 2010 and eligibility determination started before January 31, 2010
- A household member is an ineligible non-citizen. This household member does not qualify for assistance therefore household assistance will be prorated.

Failure to provide a Social Security Number at application will not preclude placement to the waiting list provided all other wait list review items can be completed. If offered a unit, non-exempt applicants must provide a SSN to proceed. Applicants not providing a SSN at that time will have 90 days to provide a SSN or they will be removed from the wait list. Residency cannot be obtained by non-exempt applicants without providing a SSN.

The owner/agent must deny and/or terminate HUD assistance, in accordance with the provisions governing the program, if the assistance applicant does not meet the applicable SSN disclosure, documentation, and verification requirements.

The Social Security Number provided will be compared to the information recorded in the Social Security Administration database (through HUD's Enterprise Income Verification (EIV) System) to ensure that the Social Security Number, birth date and last name match. If EIV returns an error that cannot be explained or resolved, assistance and/or tenancy may be terminated and any assistance paid in error must be returned to HUD. If the applicant/resident deliberately provides an inaccurate Social Security Number, the owner/agent and/or HUD may pursue additional penalties due to attempted fraud.

GENERAL POLICIES AND PROHIBITIONS AGAINST DISCRIMINATION

We comply with Section 504 of the Rehabilitation Act of 1973 and the Fair Housing Act and other relevant civil rights laws and statutes.

We are an equal opportunity housing provider. We do not allow nor will we allow discriminatory practices to take place concerning properties under our ownership or management. We support the Fair Housing Equal Opportunity policy.

Equal housing will be provided for all persons. Owners and management will not discriminate in the rental of housing.

- There will be no discrimination based upon race, creed, color, familial status, religion, handicap, gender, disability or national origin.
- There will be no assignment of minorities to designated units or sections of a project.
- There will be no discrimination against females or males because of disproportionate mixture of sexes.
- There will be no maximum age for elderly tenants who otherwise qualify for residency.
- There will be no discrimination against socio-economic classes.
- There will be no priority to members of any organization sponsoring our housing. There will be no discrimination against non-members of any such organization.
- Local residency may not be made a prerequisite of admission.

This facility does not discriminate on the basis of handicapped status in the admission or access to, or treatment or employment in, its federally assisted programs or activities. The person named below has been designated to coordinate with the nondiscrimination requirements contained in the U.S. Department of Housing and Urban Development's regulations implementing Section 504 (24 DCFR part 8 dated June 2, 1988):

Patrick C. O'Toole
1625 SE Lafayette Street
Portland, OR 97202-3862

Phone: 503-231-4922

Fax: 503-235-5915

TDD: 503-771-0912

Email: Patrick@manormangement.com

SCREENING CRITERIA

Muldoon Manor, Commodore Park Plaza, Jewel Lake Plaza, Russian Jack Manor, George Sullivan Manor, Independence Park Manor and/or Independence Park Manor II and will review and screen applicants for admission to the wait list and/or for tenancy.

ADMISSION WILL BE DENIED IF ANY OF THE FOLLOWING ARE DETERMINED:

DRUG ABUSE AND OTHER CRIMINAL ACTIVITY

- Any household containing a member(s) who was evicted in the last seven years from federally assisted housing for drug-related criminal activity.
- 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.
- Any household member is subject to a state sex offender lifetime registration requirement.
- Any household member if there is reasonable cause to believe that member's behavior, from abuse or a pattern of abuse of alcohol, may interfere with the health, safety, and right to peaceful enjoyment by other residents.
- A conviction; guilty plea or no-contest plea for any Class A or Class B felony in Oregon or a crime committed in another state that would be the equivalent of any Oregon Class A or B felony shall be grounds for rejection associated with the submitted Application for Residency.
- A conviction; guilty plea, no-contest plea or where the date of disposition, release or parole in the past seven (7) years for any Class C felony in Oregon or a crime committed in another state that would be the equivalent of any Oregon Class C felony shall be grounds for rejection associated with the submitted Application for Residency.
- Two or more misdemeanor convictions within the past seven (7) years.
- One misdemeanor crime committed in the last year may bar admission if management determines that the nature of the misdemeanor, in its opinion, is the type of crime if committed again could pose a threat to staff, building, or other tenants.
- A conviction, guilty plea or no-contest plea for any misdemeanor or gross misdemeanor involving assault, intimidation, sex related, drug related (sale, manufacture, delivery or possession with intent to sell) property damage, weapons charges, obscenity and related violations where the date of disposition, release or parole occurred within the last seven (7) years shall be grounds for rejection associated with the submitted Application for Residency.
- Any household member has a history of eviction for drug related criminal activity.

CREDIT

- Any household member has a history of failure to pay utilities and/or rent to previous landlords.
- Applicant has a credit history that indicates failure to pay creditors for a period of over 120 days from the date debts were due and if there are 5 or more such delinquencies during the last three (3) years, the applicant will be rejected.

RENTAL HISTORY

- A judgment against an applicant in an eviction case in the last five (5) years.
- Any judgment against an applicant in an eviction case that is over five (5) years where the applicant continues to owe the landlord (or successors) any amounts related to the eviction.
- Note: Eviction proceedings dismissed without judgment will not bar admission.
- Prior landlord stating they would not rent again to the applicant.
- Prior landlord provides an unfavorable reference based on any of the following reasons:
 - Unpaid rent
 - Failure to maintain property
 - Failure to keep property in a clean and sanitary condition
 - Disputes with other tenants, complaints of noise or disturbance of other tenants
 - Abusive actions toward residents, employees or guests
 - Other violations that related to or constituted a significant violation of lease or rental agreement
 - Any actions that interfered with the health, safety or right to peaceful enjoyment of the premises by others

GENERAL

Admission will be barred if owner determines reasonable cause exists that applicant's prior behavior may interfere with the health, safety, or right to peaceful enjoyment by other residents, staff, or guests.

Owner reserves the right to review rejected applications for extenuating circumstances.