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Operating Supportive Housing

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Applicable Federal Laws and Regulations

- Equal Protection Clause
- Fair Housing Act
- Americans with Disabilities Act
- Rehabilitation Act of 1973
- Age Discrimination Act
- HUD regulations
- Confidentiality laws



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Other Rules and Regulations to Consider

- State and local landlord-tenant law
- Local housing authority regulations
- Agency rules, policies, and procedures





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Your Role in Compliance

- Complying with the Fair Housing Act
- Ensuring reasonable accommodation
- Maintaining tenant confidentiality



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Developing Property Management Policies for PSH

- Joint training for all staff
- Partners develop tenant placement process
- Service provider develops criteria for client readiness
- Joint screening criteria and policies between owner, manager and service provider



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Tools for Tenant Screening*

- Option A: Tailor the screening criteria to fit the target population
- Option B: Admission is based on referral by service provider
- Other Approaches:
 - Reasonable accommodation
 - Create separate screening criteria for PSH units

* Tools should be used in consultation with your attorney

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Intake Steps of a PSH Qualified Tenant

- Initial pre-qualifying interview
- Develop application package
- Service provider makes referral
- Property manager screens application
- Property manager makes final selection decision

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Conditions of Tenancy

- Service Usage
- House Rules
- Tenant Agreement
- Dealing with Behavioral Issues
- Grievance Process

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Evictions

- Formal process same as with any other housing
- Principle of PSH – going the extra mile to support housing retention

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Tools to Prevent Eviction

- Crisis intervention by service provider
- Mediation by a neutral third party
- Referral to alternative housing within the owner's portfolio or comparable unit in the same building*

*This option should be approached carefully due to potential legal risks

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General Criteria for Evictions

- Non-payment of rent or utilities
- Damage
- Pursuing a criminal activity
- Causing physical harm
- Interfering with other tenants' peaceful enjoyment

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Steps You Could Take If Tenant has Violated Lease

- Notification to tenant and service provider
- Service provider responds quickly
- Service provider and tenant present a remedy
- Compliance monitoring
- If remedy does not work, then property manager proceeds with the eviction

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TENANT SCREENING AND EVICTIONS TOOLKIT

This toolkit provides a menu of options to assist sponsors of Permanent Supportive Housing (PSH) projects to develop effective tenant screening and evictions policies. The toolkit is not intended as a template, but instead offers guidelines and suggestions to be adapted and modified as needed. Every PSH project is unique, and therefore every project should tailor its tenant screening and evictions policies to fit with the specific needs and requirements of the partner agencies and the target population, within legal and policy guidelines. The development of these policies and procedures should be a joint effort by the owner, property manager, and supportive service provider, in consultation with an attorney.

PSH is in many ways the same as any other affordable housing. However, because of the distinct target population for PSH, there are certain elements of the screening and evictions process that will need to be modified for PSH units. This toolkit focuses on those elements. It is intended to complement or modify existing property management tools, not to replace them altogether. The tools are fairly generic in their scope and will need to be adapted to fit with particular funding restrictions or program features. Examples of project models that will require adaptations of these tools include:

- Master leases (service provider does tenant pre-screening *and* selection)
- Programs/ facilities (in some cases service usage can be a condition of tenancy)
- Alcohol and drug free housing (house rules and lease addendums can require sobriety)
- Projects with federal funding (may have more stringent screening criteria re: criminal backgrounds)

I. OVERVIEW OF TENANT PLACEMENT IN PSH

Screening tools for PSH units:

Permanent Supportive Housing aims to serve a population that is likely to be rejected by traditional screening policies. Providers will need to develop tools to insure that the target population is able to access the units. The following list outlines a variety of potential tools for accomplishing this objective. Project sponsors should carefully consider the different tools and select the approach that best fits their needs and objectives. (Note: These tools are not necessarily mutually exclusive; in some cases more than one approach may be used together. In particular, Reasonable Accommodation is by law available to all applicants as part of any screening process.)

Primary screening tools for PSH units:

- Option A: Tailor the screening criteria to fit the target population: This option is appropriate for stand-alone PSH projects which have 100% PSH units. For those projects, the screening criteria can be tailored to fit with the target population and design of the project (“Screening in” vs. “Screening out”).
- Option B: Admission is based on referral by service provider: The screening criteria can include the provision that if an applicant has an ongoing relationship with a specific service agency (from a list of agencies with whom the owner has an MOU), and that service agency provides a referral for the applicant that includes a commitment that supportive services will be available to enable the applicant to meet the conditions of tenancy, then all or some of the other screening criteria may be

waived¹. The owner or manager will still need to make the final screening decision, using objective criteria (see Section III.)

Other tools for enabling the target population to access PSH units:

- **Reasonable Accommodation:** If an applicant with a disability who does not pass the standard screening criteria can show that the availability of services or other supports will enable him/her to meet the conditions of tenancy, the owner can use this as a basis for providing a Reasonable Accommodation under Fair Housing Law (see p.4 for more information.) *All applicants have a right to request a Reasonable Accommodation at any stage in the screening process, regardless of which screening tool is being utilized.* Reasonable Accommodation is not a screening tool per se, but it is included in this section because in some PSH projects it serves as the primary mechanism by which eligible applicants can gain admission to PSH units. In projects that include both non-PSH and PSH units, and in which the PSH units are reserved for people with disabilities or a history of disabilities, modifications of the screening criteria may not be necessary because PSH-eligible applicants can request a Reasonable Accommodation as the mechanism for accessing the PSH units. [Note: some tenant advocates and property managers discourage projects from relying entirely on Reasonable Accommodation as the mechanism for insuring that the target population can access the PSH units because the Reasonable Accommodation process can be quite cumbersome for both the applicants and landlords.]
- **Mitigating circumstances:** If an applicant who does not pass the standard screening criteria because of previous rental history can document mitigating circumstances that explain the previous problems, the owner may take this information into account when processing the application. This tool could be used as part of the standard screening process, as part of an appeals process, or in conjunction with another screening process such as Option B above. In order to avoid potential legal problems, the mitigating circumstances must be as objective as possible, and should not be factors that if used would create a disparate impact on a protected class.
- **Create separate screening criteria for PSH units:** Owner may be able to establish separate screening criteria for PSH units in a building that includes both PSH and non-PSH units. However, this approach is legally risky and should only be used under the explicit guidance and advice of an attorney. Potential risks include disparate impact on protected classes and claims of discrimination by walk-in applicants who are not allowed to apply for PSH units.

Planning process:

Before the MOU is signed and the PSH project is launched, the partners will need to engage in a joint planning process that includes:

- Joint training for all staff to understand Permanent Supportive Housing and the roles and relationships of the partners.
- Partners work together to develop a specific tenant placement process that fits the needs and operations of all parties (drawing from the menu of options above).
- The service provider develops a clear process and criteria for assessing client readiness and providing referrals.
- The owner and property manager work together to develop clear, written screening criteria and policies.²

¹ Potential fair housing issues could arise if the referring service provider only serves a narrow segment of the population, meaning that a member of a protected class would therefore have no chance of being admitted into the PSH units. For example, if the sole referring service provider is an agency that only provides services to women, a male applicant could potentially make a legal claim that the screening criteria has a “disparate impact” on men. This potential legal issue could easily be addressed by having more than one referring service provider.

² For Family PSH projects, there are additional screening and eviction issues that should be planned for in advance. For example, how will the past behavior of a child affect the screening process for the household? What kind of information should be required in the referral from a service provider if the application involves an entire family? Most of these issues can

- Partners work together to develop a clear process and written guidelines for communication. For example, what information will be shared/not shared and why, and how to protect confidentiality and abide by Fair Housing Laws and HIPPA regulations. Clarify expectations of the parties around communication, response to concerns, and guidelines to resolve conflict.

II. CLIENT ASSESSMENT BY SERVICE PROVIDER

This process is based on the assumption that applicants for PSH units will be referred by a service provider with whom the housing owner/ property manager has a Memorandum of Understanding.

Step 1a: Initial pre-qualifying interview with referring service provider:

Service provider conducts a pre-qualifying interview focused on assessing applicant's ability to meet the eligibility criteria and to succeed in the housing. This interview should include:

- verification that tenant fits the target population for the PSH project³
- helping applicant understand Permanent Supportive Housing and the PSH project – in order to succeed in PSH, a tenant will need to "buy into" the PSH model;
- helping applicant understand the screening process and criteria;
- confidential medical or behavioral issues that may affect applicant's ability to complete application process, in order to identify any help needed in the application process⁴;
- discussion of ongoing services or support that the service provider can offer to the applicant to enable applicant to succeed in the housing;
- discussion of the housing provider's duty to make Reasonable Accommodations, and identification of any Reasonable Accommodations that should be requested during the screening process.

Note: Information obtained in this interview is confidential and must be kept in a file separate from the property management file. Tenant can be asked to sign a Consent of Release of Information permitting coordination between the service provider and owner/ property manager. Without a release, the service provider should not disclose information about the nature of a tenant's disability or other information that the property manager is not entitled to request directly as part of the application process.⁵

Step 1b: Service provider works with qualified applicants to develop application package:

During the pre-qualifying interview, if the service provider determines that the applicant qualifies for the PSH unit and can meet the conditions of tenancy, then the service provider assists the applicant in filling out the housing provider's application form(s).⁶ Service provider also assists the applicant in pulling together any documentation that will be needed as part of the screening process.

be addressed using the same tools that owners/ property managers use with other family affordable housing units within their portfolios. The key difference for PSH is that the service provider should be capable of assessing the needs of children as well as adults and should develop a package of supportive services to meet the needs of each individual family member.

³ All PSH projects target the long-term homeless, with an emphasis on chronic users of expensive public services such as hospitals and jails, but each project will also have a more narrowly defined target population within this broader group.

⁴ This includes potential cognitive limitations which may impact the applicant's ability to remember information or follow through on agreements without special supports or patience.

⁵ The release form should enable both the service provider and property manager to disclose information to one another. The terms of the consent should be as limited as possible, and even when signed, the property manager and service provider should only share information that is directly related to the tenant's ability to meet the lease conditions. Note that applicants can not be *required* to sign this consent as a condition of acceptance, except in cases where service usage is a condition of the lease. Once signed, tenants should be able to change the designated service provider listed in the release upon request.

⁶ Service staff should be familiar with landlord/tenant law so that they can adequately assess whether an applicant is capable of meeting the conditions of tenancy. Training in landlord/tenant law will also help service providers to communicate the obligations of tenancy to their clients once they are housed, and to work more effectively with property management staff.

As part of this process, the service provider reviews any negative past rental history with the applicant, exploring (a) what effort the applicant has made to address past behavior and history (e.g. the availability of supportive services that were not available previously) and (b) specific services that will need to be made available to the applicant in order to support his/her ability to meet the lease conditions.

Step 2: Service provider makes referral:

Service provider refers applicants who are able to meet the conditions of tenancy to the property manager/ owner for screening. The criteria for referral should include:

- applicant's ability to meet the terms of the lease (if applicant will need support in order to meet the lease conditions, the referral must certify that the necessary support will be available)
- applicant's ability to live independently (if applicant needs support in order to live independently, the service provider should confirm the necessary support will be available)
- applicant's interest in achieving stability
- applicant's interest in living in Permanent Supportive Housing
- applicant's demonstrated willingness to accommodate the terms of the lease

The referral includes a written statement from the service provider recommending the applicant for tenancy, based on the applicant's ability and desire to meet the conditions of tenancy. The referral should also include a written commitment from the service provider to work with the tenant to support his/her housing retention on an ongoing basis through the development of a tailored set of comprehensive supportive services to enable the tenant to succeed in the housing⁷. The commitment statement should also clarify what steps the agency will take if a tenant "fires" the provider or is "terminated" from the provider's services. The referral should be approved and signed by a supervisor or manager; this staff person, their title and contact information should be identified by name in the MOU and in the tenant file. (See "Sample Permanent Supportive Housing Referral Form", p. 6 in "Guidelines for PSH Memoranda of Understanding".)

At the time of the referral, the service provider and/or applicant give the property manager/ owner all necessary forms and documents to enable them to complete the screening process.

III. TENANT SCREENING BY PROPERTY MANAGER:

Step 3: Property manager screens application:

- Property manager processes necessary forms and documentation, and performs any necessary screening checks. (Note: While the screening process for PSH may include a criminal background check and credit check, having a criminal history or poor consumer credit is not in and of itself a basis for rejecting a PSH application.)
- Property manager evaluates the application according to objective screening criteria that include:
 - Verification of rent subsidy/ ability to pay rent
 - Criminal background check (see below)
 - Credit check (see below)
 - Verification that applicant has been honest and has disclosed all required information on the application form⁸.
 - Verification of applicant's ability to meet the terms of the lease (in most cases this will be based on the service provider's certification on the referral form that the

⁷ For Family PSH, the referral should include an assessment of the needs of each individual family member, along with a service plan for each member. Supportive service providers should have the capacity to address the comprehensive service needs of the entire family, or there should be a clear process for connecting family members with additional support services in the community.

⁸People with cognitive impairments may be perceived as less honest, due to memory issues and "filling-in of gaps". Providers should not necessarily assume that "disconnected information" is deliberate or meant to be deceptive.

applicant is able to meet the lease conditions and that service provider will work with applicant to support his/her housing retention.)

- Verification that referral form is complete and signed by designated management staff from referring agency

Step 4: Property manager makes final selection decision:

- Only the property manager or other designated representative of the owner should be authorized to make the final decision about whether to accept an applicant.
- Selection criteria should be targeted toward assessing the likelihood that applicant will be able to meet the essential requirements of tenancy as expressed in the lease, including paying rent, caring for the unit, not engaging in criminal activity, and complying with health and safety codes.
- Valid reasons for rejection:
 - No access to supportive services or other outside assistance to enable tenant to meet basic lease requirements and applicant does not meet the screening criteria
 - Making false statements during the interview or on the application (with consideration given to behavior linked to cognitive impairment or mental health issues)
 - Applicants who repeatedly miss scheduled appointments during the screening process may be returned to the waiting list if their absences cause unreasonable delays in filling the unit. Those applicants who have a disability which impacts their ability to meet this requirement may request special accommodation. Options include: drop in arrangements or service provider support in helping the applicant to make it to scheduled appointments.
- Appeal/ grievance process: Applicants whose applications are denied should be given information about the process for appealing the decision⁹.

Reasonable Accommodation:

- If an applicant with a disability¹⁰ cannot satisfy the requirements of tenancy because of previous rental history, housing providers must, if requested by the applicant: (a) consider whether any mitigating circumstances related to the disability could be verified to explain and overcome the problematic behavior; and (b) make a Reasonable Accommodation that will allow the applicant to meet the requirements.
- Accommodations are not reasonable if they require fundamental alterations in the nature of a program or impose undue financial and administrative burdens on the housing provider¹¹, or create a danger to other residents.
- If an applicant with disabilities who would otherwise be rejected based on objective screening criteria asserts that he or she could meet the requirements of tenancy with assistance that the housing provider is not obliged to offer, the provider may require verification that the assistance will be available to the tenant and will allow the applicant to comply with essential lease requirements. (In other words, the Reasonable Accommodation may be conditioned upon the applicant's access to supportive services provided by the referring agency.)

Use of criminal background and credit checks:

- The criminal background check helps to identify past housing barriers and provides insights into the applicant's history. It also provides verification of whether the applicant has been honest about essential aspects of their history related to tenancy during the application process. However, criminal

⁹ The specific elements of the appeal process will typically be determined by the requirements of the funding source.

¹⁰ The FHA definition of disability does not include current illegal drug users. However, individuals with alcoholism, whether or not they are in recovery, generally are included, as are former drug users who have successfully completed an addiction-recovery program. (City-funded PSH projects can rely on the FHA definition as long as their funding sources do not require a different definition.)

¹¹ Projects with federal funding that are subject to Section 504 have a greater obligation to assume the financial costs for providing a Reasonable Accommodation. If a housing development receives nonfederal government funding, Title II of the ADA may apply, and would require the provider to pay for reasonable modifications.

background should not be used as baseline criterion for tenant screening in PSH¹². Even a modified criminal background criteria will likely exclude a significant portion of the PSH target population. The evaluation of an applicant's criminal background should focus on the service provider's assessment of the applicant's likelihood to re-offend, based on a comprehensive clinical evaluation.¹³

- The credit check can help in verifying information included in the application such as Social Security numbers and past addresses. It can also help to identify past housing barriers. Poor consumer credit history in and of itself is not a reason for rejecting a PSH applicant.

IV. CONDITIONS OF TENANCY

A. SERVICE USAGE:

For Permanent Supportive Housing projects that receive capital funding from the City of Portland or Multnomah County, tenants cannot be required to use services as a condition of their tenancy. The tenant's ongoing relationship with a service provider, and the service provider's commitment to offer the supportive services necessary to enable the tenant to meet the conditions of the lease can be a basis for waiving standard screening criteria, but this does not mean that the tenant is required to use the available services as a condition of tenancy. PSH projects that are not funded by the City or County may require residents to participate in services (if permitted by the project's funders¹⁴). However, such requirements are generally not legally enforceable, and could trigger facility licensing requirements. For more information, see page 92-93 in *Between the Lines: A Question and Answer Guide on Legal Issues in Supportive Housing* (Corporation for Supportive Housing, 2001).

B. HOUSE RULES:

House rules in PSH should be based on the conditions of the lease. Acceptable rules include those related to:

- a) compliance with rental and other payments;
- b) compliance with the legal expectations of maintaining the unit and the property; and
- c) tenancy behaviors which support the rights of others to health, safety and the peaceful enjoyment of the premises.

C. TENANT AGREEMENT

PSH tenants should have a lease agreement that is the same as any other affordable housing lease. It is not appropriate to require a lease addendum for a PSH unit or to require the tenant to sign an agreement that goes beyond the terms of the lease. However, it is possible to create a written document that reinforces the terms of the lease and defines how the PSH will work. While not legally binding, such a document provides an opportunity to make sure that the tenant, property manager, and service provider are all clear about their roles and responsibilities within PSH, and it can clarify the conditions of tenancy. This document could take the form of an orientation checklist that defines what makes this PSH, the roles of the different partners, areas of confidentiality, how the parties will engage with one another, and typical orientation details like when the rent is due.

¹² Some property management firms or funders may establish baseline criminal background criteria that are non-negotiable. As long as these criteria do not exclude the target population for that specific project, this is permissible. However, as a general policy guideline, most PSH projects should avoid using criminal background as criteria for tenant screening.

¹³ Checklists of specific crimes are not an appropriate screening tool for most PSH projects, because such lists don't generally reflect the complexities of the crime or the applicant's likelihood of recidivism. Rather than relying on a stock list of crimes, each decision should be made on a case by case basis through careful consideration of the applicant's relationship to the service provider and ability to meet the conditions of the lease.

¹⁴ Some HUD programs require services as a condition of tenancy and others prohibit it. For a complete listing of the rules associated with specific funding sources, see *Between the Lines: A Question and Answer Guide on Legal Issues in Supportive Housing* (Corporation for Supportive Housing, 2001).

Note: In City and County funded PSH projects, the lease cannot include a requirement that tenants participate in supportive services as a condition of ongoing tenancy.

D. DEALING WITH BEHAVIORAL ISSUES:

Supportive services and property management staff should meet regularly to share information and problem-solve. (Clear protocols for these meetings should be established at the outset in order to develop a productive working relationship while respecting tenant confidentiality.) The service provider should work on an ongoing basis to support the tenant in addressing any issues that may affect his/her tenancy or the safety and stability of the property.

There should be a process in place that quickly alerts the tenant (and supportive services staff) if the tenant's behavior is jeopardizing his/her tenancy. This means that the tenant has agreed at the start of occupancy to have support service staff informed of property management and maintenance issues. (This requires a formal release of information at move-in.) Once the supportive services staff are notified of a problem, they should start working immediately with the tenant to develop a plan to remedy the problem. The supportive services staff should then provide ongoing support to the tenant in following through with that plan. If the problem is not remedied adequately, the property manager and supportive services staff should have a formal meeting to discuss a potential resolution.

D. GRIEVANCE PROCESS:

The rental agreement should include a clear explanation of the grievance process available to the tenant. This grievance process should provide the tenant with an avenue for appealing decisions, raising concerns, and communicating problems through a formal process. In particular, the tenant needs an avenue to raise concerns if the tenant feels she/he is not receiving the supportive services necessary in order to enable him/her to succeed.

V. EVICTIONS

Permanent Supportive Housing involves a standard lease agreement. As a result, the process and legal criteria for evictions are the same as for any other affordable housing. This section outlines specific aspects of the eviction process that are particular to PSH.

A. EVICTION PROCESS:

The formal eviction process in PSH is the same as with any other housing. However, one of the principles of PSH is to go the extra mile to try to support housing retention. The property manager and service provider should develop a set of procedures for crisis management and intervention in order to prevent eviction whenever possible. This process must be balanced with the property manager's need to protect the safety and stability of the building and to limit the loss of rent.

In keeping with the principles of PSH, all evictions in PSH units should be 30-day for cause evictions¹⁵.

Steps taken once tenant has violated lease conditions:

- Step one: Property manager notifies tenant and service provider as soon as tenant's tenancy is in jeopardy. All tenant notices are forwarded immediately to the service provider (according to the terms of the tenant's signed release of information).
- Step two: Service provider responds quickly to all notices in an effort to remedy the situation within the legal time frame. (Note: tenants will generally get a 30 day notice with 14 days to cure; the service provider will need to have the capacity to respond within this time frame.)
- Step three: Service provider and tenant present the property manager with a proposed plan of remedy. The parties negotiate a plan. (Note: at this point the property manager can require the tenant to take

¹⁵ In some cases 24 Hour Outrageous Conduct evictions may be legally permissible (this option is not permitted by certain funding sources, such as HOME.)

action to address the problem. The specific details of this action are negotiated among the parties.) A specific plan with a clear timeline should be agreed upon by all parties.

- Step four: Service provider monitors tenant's compliance and follow-through with the plan.
- Step five: If a mutually acceptable remedy is not identified, or if the tenant does not follow through during the agreed upon time frame, then the property manager proceeds with the eviction as allowable under Oregon Landlord Tenant Law.

Potential tools for dealing with serious or ongoing infractions as an alternative to eviction

- Crisis intervention by service provider
- Mediation by a neutral third party
- Referral to alternative housing within the owner's portfolio, or to a comparable unit in the same building¹⁶

Reasonable Accommodation:

- Reasonable Accommodation extends to the eviction process. For example, while a verbal altercation with another tenant might be grounds for evicting tenants who do not have a disability, the provider has a legal duty to "go the extra mile" before evicting a tenant whose behavior is affected by his/her mental disability. This may involve setting up a conference with the tenant's service provider to discuss the problem so that it can be remedied through medical or therapeutic intervention. Eviction should be considered a last resort in these situations.
- If the tenant violates the lease and requests a Reasonable Accommodation to avoid eviction, the property manager is required to negotiate a solution with the tenant. This solution could require the tenant to engage in supportive services or other strategies to address the situation that led to the lease violation. If appropriate supportive services are readily available to the tenant, and the tenant refuses to access those services, and no alternative solution is offered by the tenant as part of the negotiations, the landlord would have grounds for eviction.¹⁷

B. CRITERIA FOR EVICTIONS:

Valid criteria for eviction:

Eviction criteria in PSH are tied to conditions of the lease. Examples of valid reasons for eviction:

- a) non-payment of rent or utilities
- b) damage to the unit or building property
- c) pursuing a criminal activity on or near the premises
- d) causing physical harm to staff or others on the premises
- e) interfering with other tenants' peaceful enjoyment of the premises or other material non-compliance

Note: For City and County funded PSH projects, if the tenant's ability to comply with the lease is based on ongoing support from a service provider, and those services cease to be available (either because the service provider pulls out, the tenant loses eligibility, or the tenant refuses to access needed services), the withdrawal of services in and of itself cannot be a reason for eviction. However, if the withdrawal of the services causes the tenant to violate the lease agreement, then the tenant can be subject to eviction. (For more information, see page 91 in *Between the Lines*.)

¹⁶ This option should be approached carefully due to potential legal risks.

¹⁷ Under this scenario, the tenant cannot be required to access the services of a specific provider or a specific program.

Tenant Selection Flow Chart

Task	Actions by Property Management	Actions by Supportive Services
Outreach	<p>Prepare descriptive materials on project</p> <p>Notify Continuum of Care, local providers, advertise regarding available units</p>	<p>Train/educate all staff regarding project including eligibility criteria and project objectives</p> <p>Ensure that all outreach staff are knowledgeable regarding Supportive Housing model</p>
Application	<p>Distribute and collect applications for housing</p> <p>Assist applicants in completing applications</p> <p>Time/Date all applications recieved</p>	<p>Provide support/assistance in completing applications</p>
Information gathering	<p>Verify information provided</p> <p>Obtain housing history reference, if possible</p> <p>Credit Check / Criminal Background Check</p>	<p>Obtain clinical information to verify that project will be able to address needs of potential tenant</p>
Assessment	<p>Determine whether there are any issues in applicant's background/history that would provide a cause for not offering housing.</p>	<p>Determine whether applicant (with support) will be able to live independently. Assess if issues that have interfered with housing in the past have been either addressed or support can be provided.</p>
Decision	<p>Participate in joint review</p> <p>Based on information provided and assessments conducted by property management and supportive services, decide whether to accept applicant.</p> <p>For accepted applicants, convey decision, arrange and coordinate move-in process</p> <p>For rejected applicants, convey information regarding decision to applicant, offer suggestions on other housing options, and review appeals process</p>	<p>Participate in joint review</p> <p>Follow-up with accepted tenants to offer support (as-needed) in move-in process</p>
Appeals Process	<p>Explain to applicant process for appealing decision: information must be provided that would mitigate grounds for admission having been denied</p> <p>Review additional/mitigating information provided by applicant</p> <p>Additional materials to be reviewed by staff not involved in initial admission decision or staff subordinate to those who made the initial decision</p> <p>Final decision on admission made</p>	<p>Offer assistance in compiling/preparing information to be used as basis for appeal of decision</p> <p>Participate in appeal process, review materials submitted, and confer with property management</p>