
Providence at the Heights (PATH) Permanent Supportive Housing Community

Operations Manual



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Section One: PATH PSH Program & Project

1-1. Program

Providence at the Heights (PATH) offers permanent supportive housing to low income households (earning at or below 30% AMI) experiencing homelessness with disabilities and who would benefit from services due to past criminal justice involvement and behavioral health needs. PATH offers an array of support services to assist residents in achieving housing stability and provide necessary linkages to resources within the community. The overall objective is to assist residents in:

- Remaining stably housed
- Increasing income and/or financial resources
- Enhancing health and personal well-being
- Reducing returns to jail/prison or homelessness

While the resident is living in an affordable and supportive environment, the hope is that he/she will increase a positive self-image, become an active participant and feel that they are a part of their new home community.

The premise of Permanent Supportive Housing is that once people are living in their own homes, they can start to address the factors that contributed to their homelessness. Although engagement with services staff is not a requirement to retaining housing, services staff will attempt to engage with each resident on a regular basis while they are residing at PATH.

1-2. Project

PATH is located at 15650 E. Alameda Parkway, Aurora, CO 80017. The building has fifty apartments, 49 of which are designed to meet the special needs of low incomes households with disabilities, forty of the apartments are 1-bedrooms, 10 are 2-bedrooms, and 1 unit is designated as a Guest Unit for family members of residents to stay in when visiting for more than an overnight visit.

In the Fall of 2017, Second Chance Center was awarded a 9% low-income housing tax credit award from the Colorado Housing and Finance Authority (CHFA) and 49 project-based vouchers from CDOH (Colorado Division of Housing), which subsidize rents in the 49 units. These funding sources help to build and operate the building. BlueLine Development, Inc. developed the property and Shopworks Architecture designed it. BlueLine Property Management manages the building and has a property manager located on site at PATH.

Funding for Providence at the Heights came from a variety of sources with National Equity Fund as our investor who brought over \$10.5 million in equity to the project. BlueLine owns 0.0075% of the project as the managing General Partner (GP) and

SCC owns 0.0025% as the co-general partner. East Metro, as SLP, owns 0.01% and the Limited Partner (NEF) owns 99.98%, totaling 100.00% of the Partnership.

Throughout the initial five years of operations, BlueLine will work closely with SCC to train staff and build the capacity necessary for eventual sole ownership of Providence at the Heights. If after five years of operations SCC meets all required financial and managerial benchmarks required by NEF, BlueLine will remove itself from the General Partnership and SCC will hold 0.01% ownership as sole General Partner. At the end of the tax credit compliance period (15 years), SCC will have the right to pay off any remaining debt on the project and become 100% owner through a right of first refusal granted by NEF. SCC will have had 15 years of experience complying with federal, state and local regulations and plans to keep the building affordable indefinitely. Should SCC be unable or choose not to exercise this Right of First Refusal, Aurora Housing Authority will have the option to exercise a secondary Right of First Refusal and continue operating the project as is.

Section Two: Application & Selection Process

The following policy has been established to ensure fair and equitable practices for selecting applicants to occupy apartments at PATH. The procedures specifically address the standards set by the various funding sources. PATH policy maintains strict adherence to non-discriminatory and Fair Housing laws.

2-1 Non-Discriminatory Policy

PATH does not discriminate on the ground of race, color, sex, religion, national or ethnic origin, familial status, sexual orientation, gender identity or disability, or otherwise be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under PATH housing programs. All applicants are considered with impartiality, and information about an applicant is taken into consideration and related solely to the attributes and behavior that could affect residency.

2-2 Eligibility Requirements

All applicants will be referred through OneHome (Coordinated Entry System (CES)), who have been screened and assessed using the VI-SPDAT (Vulnerability-Index Service Prioritization and Decision Assistance Tool). They will be prioritized on the waiting list according to their score (highest to lowest) based on chronicity and medical vulnerability of people experiencing or at-risk of homelessness.

In addition to the VI-SPDAT score, a filter will be put on the CES priority list to give higher priority to people who a.) would benefit from behavioral health services; and/or b.) would benefit from services because of involvement in the criminal justice system.

When a unit designated as handicapped accessible becomes available, the first person on the waiting list who has indicated a verifiable need for the features of a handicapped accessible unit will be contacted for an interview. If the applicant meets the minimum screening criteria, they will be offered the unit before other applicants.

2-3 Screening Information

The applicant will be required to complete a screening packet containing:

- verification of disability by a licensed care provider
- verification of homelessness/chronic homelessness
- release of information between the referring agency, and PATH
- sign an authorization to conduct a background check
- packet containing HCV project-based voucher forms
- packet containing tax-credit forms

2-4 Resident Selection and Informal Review

An applicant, who does not meet the requirements for suitability or eligibility, is notified in writing. Reasons for denial include, but are not limited to, if any household member:

- a.) has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine in any location, not just federally assisted housing;
- b.) is currently registered as a sex offender under any State registration requirement, regardless of whether it is for lifetime or not;
- c.) has been convicted of sex assault within the last 10 years.

Based on not meeting the above criteria (a.b.c.) the applicant will be denied. BlueLine Property Management must give an applicant prompt notice of a decision denying assistance. The notice must contain a brief statement of the reason for the denial and must also state that the applicant may request an informal review of the decision. A copy of this denial must also be sent to Aurora Mental Health Center (AuMHC), the voucher administrator for PATH.

The applicant shall have 14 business days from the date of the letter to request, in writing, an informal review of the decision for denial. Providence at the Heights must schedule and send written notice of the informal review within 10 business days of the family's request. The informal review must be conducted by a Regional Manager or Assistant Director. Providence at the Heights will notify the applicant in writing of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 5 business days of the informal review to the applicant and his or her representative, if any, along with proof of mailing.

If the decision to deny is overturned as a result of the informal review, processing for admission and final approval will resume.

If the family fails to appear for their informal review, the denial of admission will stand, and the family will be notified.

2-5 Rent & Security Deposit

The PATH rental structure is set up to have a tenant pay no more than 30% of their income towards their housing cost. Resident living in the 49 project-based voucher units will pay approximately 30% of their income towards rent. The rental amount will be determined by an HCV staff specialist. These rents are regulated by the Colorado Housing and Finance Authority and the Colorado Division of Housing and are updated and published annually. All utilities are included in the rental amount.

Security Deposit for all units will be \$300. If a resident is unable to pay the full amount a payment plan will be created between the Property Manager and the resident. However, a minimum payment of \$50 towards the security deposit is due at the time of lease-up.

2-6 Occupancy Standards

For each family, DOH determines the appropriate number of bedrooms under DOH subsidy standards and enters the family unit size on the voucher that is issued to the family. **The family unit size does not dictate the size of unit the family must actually lease, nor does it determine who within a household will share a bedroom/sleeping room.**

The following requirements apply when DOH determines family unit size:

- The subsidy standards must provide for the smallest number of bedrooms needed to house a family without overcrowding.
- The subsidy standards must be consistent with space requirements under the housing quality standards.
- The subsidy standards must be applied consistently for all families of like size and composition.

DOH will assign one bedroom for each two persons within the household, except in the following circumstances:

- Generally, persons of different generations, persons of the opposite sex (other than spouses or co-heads), and unrelated adults (except for same-sex domestic partners) should be allocated a separate bedroom. "Different generations" means the difference between a parent and a grandparent, a parent and a child, etc. "Different generations" does not refer to siblings of significantly different ages.
- A single parent with a child under the age of 3 will be issued a 1-bedroom voucher and is expected to share a bedroom with their child.
- Household members of the opposite sex, who are both the age of 3 and younger, will be expected to share a bedroom.
- Live-in aides will be allocated a maximum of one bedroom. No additional bedrooms will be provided for additional family members of the live-in aide.

DOH will reference the following chart in determining the appropriate voucher size for a family:

Voucher Size	Persons in Household (Minimum – Maximum)
1 Bedroom	1-2
2 Bedrooms	2-4

Accommodations for persons requiring live in aides will be subject to the availability of a 2-bedroom apartment.

Section Three: Collaborative Management

One of the key factors in supportive housing is a multi-disciplinary, multi-agency, client centered collaboration. The greater part of this manual will describe how services are provided.

Collaboration has proven to be an effective working model for improving and increasing successful engagement and effective intervention with residents who may have many service needs and little experience with support services. Each agency in the collaboration has its own culture, expertise, resources, and policies and procedures, which may or may not always coincide with those practiced at the housing site. When discrepancies are discovered between policies of PATH and a partner agency, both parties negotiate, in good faith, to arrive at a workable solution.

The collaborative approach has been critically important in identifying and addressing problems that can be disruptive to the building community or put a resident's housing in jeopardy due to lease violations. By working closely together with the resident, support services and property management, staffs are often able to help the resident avoid behavior that may lead to eviction, hospitalization or incarceration.

The support services staff and the property management staff must work together to oversee resident needs and manage the administrative requirements of the building. Although the two managers (Director of Resident Services and Property Manager) have different roles and responsibilities, it is expected that the director of resident services and property manager will share the goal of assisting residents toward housing stability. The decision-making process can be difficult, as each manager may have a different focus: the services staff (care managers') main priority is to encourage housing retention while the property manager's goal is to enforce the lease. Property Management and key Services personnel are expected to hold regular weekly meetings to share information and make collaborative decisions. If an agreement cannot be reached, a final decision will be made by the owners of the development (SCC and BlueLine).

In addition to addressing building and resident issues, the director of resident services and property manager will work together to address issues in the community. Examples include community cleanups, neighborhood celebrations or addressing neighborhood complaints. Both managers are equally invested in the success of the residents and the community.

3-1 Staff

PATH will support staff with on-going training and development as well as assistance when needed, with short-term counseling, referrals, and follow-up services to employees who have personal and/or work-related problems.

The following staffing plan developed for PATH allows the management office to be open during normal business hours. In addition, there will always be a staff on site so that there is a 24-hour staff presence at the housing community. The property manager's office is generally open for business Monday-Friday 9:00am to 4:30pm.

Property Staff

Property Manager

Custodial Services

Maintenance Technician

Services Staff

Director of Resident Services

Care Managers

Full-Time Front Desk Staff (3+ staff on rotating shifts)

Peer Specialist

AuMHC Clinician

Family Advocate (TBD)

Part-time Mentor

Securitas, overnight front desk (as needed)

3-2 Supervision

The Director of Resident Services will direct the day-to-day operations of PATH. Staff members will report to their direct supervisors and meet individually with them on a regular basis. The director of resident services also conducts a bi-weekly team meeting for all front desk staff to review any issues with residents, do program planning, and provides on-going opportunities for training and to learn from each other.

3-3 Roles of Property Management Staff

Property management in supportive housing often involves more extensive interaction with residents than conventional property management because of the special needs and issues of the resident population. Although the primary focus is on the many details and tasks required for the efficient operation of the property, the property manager must also be aware of the needs of the residents. BlueLine has extensive property management experience and has the sensitivity and flexibility necessary to effectively attend to both the building and the residents. This ensures a positive impact on the community and the residents it serves.

The primary role of property management is to address the physical and financial needs of the building. The property manager represents the owner and is responsible for determining eligibility and leasing vacancies, enforcing the lease, maintaining the building and its security, handling requests from residents for repairs and physical needs (such as moving furniture, etc.), and collecting rents. The property management and maintenance staff are available after business hours should there be an emergency.

3-4 Roles of Front Desk Staff

The front desk serves as a “welcome desk” for residents, guests and vendors coming into and leaving the building. Front desk staff, in collaboration with property management staff, oversees security of the of the building 24 hours a day, seven days a week. Moreover, front desk staff has the responsibility to ensure that all residents and guests enter the building according to policies.

The front desk staff support, interact and communicate regularly with the residents of PATH. They are responsible for responding to resident concerns, safety, on-site disturbances, noise, or other security issues impacting residents or the safety of the community. In addition, front desk staff keeps service staff informed of resident behavior, concerns, and issues in the community. Front desk staff also complete light janitorial work in common areas and provide clerical and administrative support to the director of resident services and property manager.

3-5 Roles of Supportive Services Staff

While services are voluntary for residents, each care manager will be required to provide outreach and intake services, assessment for services, Individual Service Plan development, encouragement, support, mentoring, role modeling, coordination with partner agencies, advocacy, counseling, crisis intervention, monitoring, and follow-up services. Care managers and other support service staff are at PATH to support residents in meeting whatever goals the residents have defined for themselves. Preserving a therapeutic relationship that is client-driven and based on self-determination by and for the client, is the most important aspect of the relationship. Some roles of supportive service staff include, but are not limited to, the following:

- Assistance with the move-in process
- Assistance with budgeting, paying rent
- Access to employment opportunities and job training
- Connecting residents to Medical and health services (physical, dental, behavioral health)
- Getting families connected to services for their children
- Counseling and support in achieving self-identified goals
- Assistance in meeting lease obligations
- Referrals to other services or programs
- De-escalating potential crisis and responding to crisis
- Conflict-resolution
- Coordination with Property Management

More information about supportive services staff and plan is below in Section 4 of this document.

3-6 Resident Privacy

Residents are entitled to privacy. Management must give 12 hours written notice before entering a resident's apartment, except in the case of an emergency. Only in an emergency, or if the staff suspects a resident is in danger, will they enter the apartment to check on the resident (this may include allowing appropriate emergency response services, such as police, fire department, EMT to enter along with staff). No staff shall enter a resident's apartment unless conducting business or deemed warranted by service staff. An example of an approved activity would be a treatment provider, where it is necessary to perform services in the home environment, such as instructing a resident in an activity of daily living (cleaning, bathing, cooking, etc.).

Section Four: Support Services Plan

The Support Services plan is intended to describe guidelines and protocols, scope of services, staffing, partnerships, and documentation for Resident Services.

4-1 Service Philosophy

Since its inception, Second Chance Center has been providing services through a Trauma-Informed lens. All of its clients have experienced trauma from being incarcerated and in their lives leading up to the time of incarceration. As personal traumas present in the lives of program participants, SCC staff is always careful to form a trusting relationship and gauge an individual's readiness to change before advocating for service connection.

PATH staff will engage through a Housing First, low-barrier model. The goal will be to keep clients stably housed and assist them with client identified goals. Through Motivational Interviewing and Harm Reduction practices, SCC will engage clients in goal-oriented, yet participant-centered relationship building, cultivating intrinsic motivation within program participants. Through the Motivational Interviewing process, participants are progressively invited to explore and engage with the causes or reasoning for ambivalence, working towards a gradual self-initiated adjustment of behaviors connected to self-sufficiency.

Staff at PATH practice Harm Reduction with its clients. Harm Reduction is also a movement for social justice built on a belief in, and respect for, the rights of people who use drugs or alcohol. PATH staff offer a service approach that is holistic, and client centered. PATH's approach is one of recognizing that many of the realities of our society are powerfully stacked against these clients. Racial and ethnic inequality is pervasive in this work. One goal is helping clients live into a new kind of social reality marked by equity and respect across many of the dividing lines found in society. Providing housing is a key next step in this work. Models of Harm Reduction will be implemented with clients as appropriate.

While services are voluntary for residents, each case manager will be required to provide outreach and intake services, assessment for services, ISP development, encouragement, support, mentoring, role modeling, coordination with partner agencies, advocacy, counseling, crisis intervention, monitoring, and follow-up services.

4-2 Staff Roles & Standards of Conduct

The support services plan reflects the resident's stated desires and goals in order to help each household live independently, attain a level of economic independence, gain self-sufficiency and maximize his/her abilities. Supportive housing provides an environment where households can live with dignity and respect, utilizing support systems for independent living. This means the array and depth of services offered is defined by a combination of the residents' stated needs/requests, and professional program development.

The strategies used to provide case management services to the residents are as diverse as the residents themselves. The main goal is to help residents gain and maintain stability in their lives. The support services staff offers assistance and intervention as needed or requested to help residents identify and change behavior patterns that threaten their ability to maintain a stable housing situation. Some residents may need only minimal support from staff; others may need more extensive services.

The PATH staffing plan includes a significant variety of individuals who can walk with the residents on their paths towards stability. We understand that case management must be dynamic and creative and will ensure the proper staff are in place for the program to thrive.

Support services attempts to enhance household health and well-being, and to develop a sense of community. In addition to economic hardship and, in some cases, profound disabilities, previously homeless households often suffer from a crippling sense of isolation and low self-esteem. The staff seeks to engage residents in support and social activities that help households address these issues and create a sense of community.

Staff should keep in mind that:

- Offering too much help cultivates dependence, conflicting with the program's goal of independence;
- Offering too little help creates painful confusion and frustration, and sometimes results in disappointing experiences for both staff and residents;
- Trying too hard is well intended but often chases residents away – in opposition to the goal of engagement and relationship building;
- Trying too little, or a staff member's participating passively, is frustrating and ineffective for the resident. It sometimes is a result of feeling helpless, hopeless or resigned;
- Giving freely and gladly of available time, coupled with a willingness to take risks, be flexible, and go the distance, helps residents turn their ideas and goals into a reality. This is vitalizing for residents, the staff and the building community;

There are numerous challenges to provide voluntary services to residents living in a community environment, who are known to have substantial support needs. In order for services to be effective all staff must:

- Place emphasis on early engagement and follow through;
- Understand that household meetings and group activities are voluntary, and resident driven, i.e., staff should respond directly to resident stated needs and desires;
- Provide services/activities that are user-friendly, with a multitude of ways and opportunities to participate;
- Deliver services which are culturally relevant -- considering race, ethnicity, age, gender, sexual orientation, as well as the culture of poverty, substance abuse, chronic illness, homelessness, community living, etc.;

- Remember that harm reduction is a priority every day and in every way. The goal is to decrease illness and self-injurious behavior, and to increase healthy habits resulting in better health and a generally improved situation.
- Be committed and nonjudgmental;
- Be aware of community dynamics;
- Have good, basic clinical skills, and be able to work closely with residents at unusual, practical and mundane tasks;
- Utilize their clinical/personal skills to build lasting, effective relationships with the building community;
- Provide collaboration, consultation, expert advice and practical help to each other, as well as to the residents;

Standards of Conduct for Staff

- Social media includes websites such as Facebook, YouTube, Twitter and many others. The potential for misinterpretation of relationships and breaching of confidentiality exist when you interact with residents on social media. Therefore, it is best to refrain from interactions with residents on social media.
- Do nothing to diminish the dignity of any person.
- Refrain from exploiting a privileged position, knowledge, or power.
- Promote and ensure safety for residents as well as staff.
- Do not intentionally harm or abuse verbally, emotionally or physically any resident or staff person.
- Do not have sex or engage in any type of intimate touch with any resident.
- Do not use drugs/alcohol with residents.
- Do not provide or purchase drugs or alcohol for residents or accept them as a gift
- Do not engage in any transaction with residents where money comes out of, or goes into, your pocket
- Do not socialize outside of work with residents. If you see a resident in a public setting, allow them to acknowledge you first and keep interactions brief by being careful not to violate confidentiality.
- Do not socialize with residents in their apartment while working or when not working.
- When in doubt about a course of action, consult with your supervisor.

4-3 Support Services Team Approach

The benefits of a team approach affect the entire community, by providing a seamless support system for residents and creating a supportive environment for staff. Each service coordinator has an identified caseload; however, all staff interacts with all the residents through on-site activities, shared offices or by informally meetings in the lobby. Therefore, information is shared with the entire team during team meetings, with respect to confidentiality policies and a need to know basis. If a care manager for a specific resident is off site, another staff person can intervene and assist the resident then update the off-site service coordinator.

It is imperative that staff communicate and consult with each other in order to provide a continuity of care and consistent approach.

4-4 Service Staff Descriptions

Director of Resident Services:

The Director of Resident Services has overall responsibility for coordinating all on-site services, leading the service staff, and administrating the program. In addition, he/she plans for the needs of the residents and staff, supervises front desk staff, and maintains a strong and workable relationship with the service provider community and the property manager.

The Director of Resident Services also assesses the suitability of referrals and helps to coordinate a smooth orientation for residents. The Director of Resident Services also participates in the development of policies and procedures to ensure compliance with established regulations and contractual obligations and builds and maintains partnerships with community partner agencies to develop resources.

Care Managers:

Providing care management services to residents requires flexibility and creativity. Not all residents want or need services and some residents need services that they refuse. Service coordinators respect the desires of the resident and “meets the resident where he/she is at.” For this reason, case management services can occur from the traditional office setting or in the hallway or the sidewalk or in the common area.

For example, the staff must be sensitive to the fact that a resident's primary need may be mental health services, but he/she may choose to engage with staff around social or educational activities only. It is often the case that the staff person has to work slowly to build a trusting relationship with the resident in order to provide the ongoing service needed and/or effective intervention to avoid a crisis or help resolve it.

Additional Staff:

- A .5 FTE Family Advocate who will provide support to the families in the building who need intensive services as well as provide wellness support to the families. The Family Advocate will also focus on family reunification.
- 3.5 FTE front desk staff many of whom will be peer mentors and have lived experience.
- 1 FTE Peer Navigator who will provide activities to the residents, alongside advocacy and support.
- A .5 FTE Mentor who will be offering mentoring, role modeling, and implementing the SCC Never Going Back curriculum for interested residents

All residents of PATH are assigned to a care manager. The care manager is responsible for engaging with the resident upon move in, completing the initial assessment paperwork and service plan, providing on-going services, coordinating outside services for the resident and reaching out to residents who aren't receiving services. While the network of services provided is comprehensive, it should be clear that it is not meant to provide for all the needs of the resident. The services team works closely with a variety of providers throughout the community and connects residents with them as needed. In addition, the service coordinator accounts for each resident in his/her caseload in order to keep documentation of demographics, service providers and progress notes.

Care managers may facilitate groups and participates in all in-house community events. A very important aspect of the service coordinator's job is to engage residents and build relationships in order to assess needs and opportunities for intervention. Some residents may be more willing to engage through on-site activities and will eventually participate in formal case management services.

Additional Community Partners

- **Benefits in Action** is an organization that helps people determine their eligibility for Medicare, Medicaid, SNAP and SSI and SSDI, prescription assistance etc... They will assist PATH residents over the phone or in person and will help them fill out all necessary paperwork and submit it with them to the appropriate agency or county.
- **STRIDE** is a physical and behavioral health provider who has committed to being a direct referral off-site provider for physical and behavioral health.
- **Aurora Central Library** committed to coming to PATH 2x per month to do story time/ reading with children and to do a crafting/ creative activity with teens.
- **Tollgate Elementary** – The closest elementary school has committed to working with children living at PATH to ensure they receive the support they need to thrive at school.
- **No Smile Left Behind** is a non-profit dental health provider that will bring a fully loaded dental clinic bus to the PATH on a mutually beneficial schedule to provide free dental care to residents. No Smile Left Behind has 5 years of experience providing dental care to the homeless community.
- **Circle of Parents** is a parent led support group that will provide training and facilitation to help PATH staff form a parenting support group and identify and help identify and support a parent led peer mentoring group. Topics will include social connections, parental resilience, concrete support in times of need, parenting and childhood development, and social and emotional child development, among others. The Circle of Parents will be held weekly at PATH.
- **Cooking Matters** – Has extensive experience with their 25 years in service (founded in 1995) and will work with residents to learn how to cook and prepare healthy food for all members of their family. Cooking Matters will offer the following services: 1) 1.5-hour trip with participants to a grocery store to read labels and learn about nutrition shopping. 2) 6-week course where participants come 1x per week for 6 weeks. 3)

Classes that target parents and caregivers of children ages 0-5 to teach about healthy food options for young children.

- **Swallow Hill Music** agreed to provide certified music therapists and waiving their fee for PATH residents.
- **Asian Pacific Development Center** committed to train residents on “know your rights w/ police,” to help them stay out of jail.
- **Colorado Affordable Legal Services** agreed to come on site to perform a training on eviction prevention/ landlord/ tenant issues/ Fair Housing for PATCH tenants.

4-5 Resident Emergencies

Emergencies include suicide threats/attempts, fights, medical emergencies, and death. The property manager and director of resident services are available after office hours in case of emergencies. If needed the front desk will contact 911 to evaluate the situation. Regular trainings on how to handle emergencies is provided and debriefing for staff and residents occurs following emergencies to improve future responses.

4-6 Documentation

Staff will record information about routine events and areas of concern. This is used for daily communication of information from one shift to the next and is read by incoming staff at the beginning of each shift. It is imperative that staff update this record so that other staff can appropriately follow-up and respond to resident and community needs. The record should be used to document observable resident or guest behavior, statements a client makes to staff, and situations in the building (e.g. police or emergency vehicles being called or residents going to the hospital). Care management notes and confidential information are recorded in a separate electronic database. These records are accessible by designated service staff.

The Director of Resident Services will maintain various demographic and service delivery data by utilizing the Homeless Management Information System (HMIS) database. This information will be used for reporting both on internal program analysis as well as HUD compliance reporting. Training will be provided to staff on how to use the database.

4-7 Paper Files

In addition to the electronic daily log and database, paper files will be maintained for each client. The paper file will include the Releases of Information, the resident service plan, and any other pertinent documentation/information. Progress notes are maintained by PATH in a separate database. Partnering agencies are responsible for maintaining their records in their agency databases.

4-8 Resident Engagement

It is the policy of PATH to engage residents in the decision-making process whenever possible. To this end, we have determined several strategies to specifically engage residents of PATH's Permanent Supportive Housing. These include, but are not limited to:

- Regular one-on-one meetings with each resident to discuss their needs and goals (bi-annually)
- Monthly newsletters where staff can share information with the residents
- A suggestion box located in the lobby where residents can anonymously share ideas or concerns.
- Resident surveys to identify the level of interest from the residents in different services and activities.
- Employment of current residents or formerly homeless individuals when possible and appropriate.
- PATH Resident Council

Section Five: Property Management

5-1 Reasonable Accommodations

A reasonable accommodation is a change to a procedure or dwelling that allows a person with a disability an equal opportunity to participate in services and housing. Under HUD's policy, a household may be considered a person with a disability if a physical and/or mental condition causes substantial difficulty in performing a major life function. Major life functions include but are not limited to; the ability to walk, see, hear, breathe, think, work, or care for self.

All applicants/residents are provided the opportunity to request a reasonable accommodation. Reasonable attempts will be made to provide the requested accommodation in rules, policies, practices, and services. To ensure we adequately address the request for a reasonable accommodation we ask residents to put the request in writing. See Exhibits B and C.

5-2 Recertification Process

All residents of PATH will be required to meet with the Property Manager once a year to conduct an annual income certification review. This process is required by Colorado Division of Housing and Colorado Housing and Finance Authority (CHFA), funding sources of PATH, and will include income and asset verification, as well as an apartment inspection.

5-3 Guest Guidelines

- Residents are permitted to have approved overnight guests stay in their unit for a total of (14) days within a 12-month period. An approved guest is someone who has not been evicted from the property, who is not on the "banned from the building" list and/or is not on the no trespass list. Resident must register their guest at the front desk when a front desk is present in a building. If there is no front desk or property management on site, registering the guest will not be required however any extended visits beyond 14 days will require the resident to contact the off-site property manager to obtain approval.
- If resident has exceeded their overnight guest days, they can ask for approval from property management for additional days. Property Manager has the discretion to approve or deny a resident's request for guests and/or extended stays.
- Residents are responsible for the conduct and actions of their guests and are liable for any damages to the property that they may cause. Guests must obey all rules and are not allowed to travel throughout the building without being accompanied by the resident.

- Residents are permitted to have daytime guest(s) visit their household during the hours of 8:00am and 11:00pm.
- **Temporary NO Guest Policy** - At the discretion of property management, we reserve the right to temporarily suspend a resident's privilege for guests. If management feels the need, they can temporarily suspend all overnight visitors' privileges in the building if they feel this is needed to regain order. If this is implemented, no visitors will be allowed in the building between the hours of 11pm – 8:00am. Residents who bring problematic or disruptive guests into the community could also be issued a lease violation.

See Exhibit D for Overnight Guest Policy

5-4 Caregiver, Personal Care Assistant (PCA) and/or Home Care Worker & Live-In Aids (LIA)

- Caregivers, PCAs and/or Home Care Workers are not considered LIAs and cannot live in the apartment. LIAs can only be approved via the Reasonable Accommodation process.
- Staff can grant caregivers, PCAs and/or Home Care Workers access up to their client's specific floor. Such persons may leave the resident's apartment unattended only for the purpose of doing laundry and/or exiting the building. All guest rules apply to Caregivers, PCAs and/or Home Care Workers.
- Caregivers, PCAs and/or Home Care Workers must check-in at the front desk, listing their hiring agency, contact information, and duration of time they will be in the building.
- Live-In Aids: A successful applicant with an approved LIA cannot move-in until the LIA has been qualified through with the approval process. The applicant will stay at the top of the wait list for a 2-bedroom apartment and will get the next available apartment once that process has been completed. LIAs must pass through the Redtail Ponds screening criteria and will be held at a higher standard of conduct than the residents. If a LIA is found to be violating lease or community rules that person will be trespassed from the property immediately.

5-5 Substance Abuse Policy

At PATH, we recognize that legal and illegal drug use is a part of the world and the communities in which we live. We do not support illegal drug use; however, we do wish to minimize the harmful effects of drug use on each individual and the community as a whole. We wish to respect every individual's right to health and well-being and to acknowledge their ability to take responsibility for their behavior as it affects themselves, their loved ones and

their community. PATH does not condemn drug use; and we do not allow unacceptable behaviors resulting from the misuse of substances.

We recognize that for some people this will mean total abstinence from drugs and alcohol and for others this may mean responsible use. This includes discussing tenant's choices regarding substance use in a non-judgmental manner and helping them make decisions for themselves about their own substance use goals. If drug and alcohol use is apparent, we will explore with the tenant what purpose it serves for them, and how it causes them harm.

- Absolutely no drug dealing, or distribution will be allowed at PATH. This includes the buying and selling of any illegal substance or psychiatric medication on or immediately surrounding the premises. Staff will contact police if dealing or distribution becomes apparent in the building.
- No illegal drugs or alcohol in the building or the community areas at any time. This includes the lobby, kitchen, hallways, resident lounges, eating area, television lounge, smoking balconies, and courtyard.
- No public intoxication in the above community areas.
- No drug seeking behavior in the community. This includes, but is not limited to, knocking on other resident's doors requesting money or substances and threatening other residents or staff.
- As we respect resident's right to use substances safely, they must respect the rights of other residents who choose not to use at all. This means that the substance use may not disturb other residents. This includes, but is not limited to, making excessive noise or being noisy after hours, leaving drugs or drug paraphernalia in public areas, having excessive visitors, or having substances available or visible to other residents.
- Substance use cannot interfere with the financial responsibilities of each tenant such as payment of rent becomes a problem, money management may be offered as an alternative to eviction.
- Residents will be responsible for ensuring that their visitors comply with the above standards.
- If substance use becomes problematic to the community, or it appears that substance use is endangering the housing status of a resident, substance use counseling may be arranged through staff of Aurora Mental Health Center as an alternative to eviction.

5-6 Monthly Housekeeping Inspections

Services Staff will conduct monthly housekeeping inspections to ensure that apartments are maintained in a decent, safe and sanitary condition, as well as ensure resident stability and well-being. Check-ins for all apartments will be conducted monthly to identify and remedy issues before they escalate. In order to accomplish this, an average of 10 apartments will be observed weekly.

- Residents will receive 24-hour notice of the check-in/entry of their apartment by staff.

- Monthly check-ins will be performed by services staff. Housekeeping standards are a lease addendum.
- The frequency of check-ins may be increased if residents are not able to pass on a consistent basis. In addition, the Director of Resident Services and property manager may conduct check-ins if the resident has multiple fails and/or there are other significant occurring issues.
- Three months of successful housekeeping may result in reduced frequency of housekeeping inspections.
- One annual preventative maintenance inspection will be conducted for every apartment by maintenance and property management staff.
- During housekeeping inspections, staff will not go through the personal possessions of the resident.

5-7 In-Patient Treatment or Incarceration

If a resident elects to enter into an in-patient treatment program for substance abuse, mental health treatment, hospitalization or physical rehab, the resident's apartment can be held available for 180 days.

The director of resident services will determine the length of time an apartment will be held when a resident is incarcerated. Consideration will be based on the nature of the offense which led to incarceration and time expected to be served. Any amount of time beyond 30 days will need to be requested and then approved.

Section Six: Resident Crisis Management

The primary purpose of the resident crisis management protocols is to ensure the safety of PATH residents and staff. The following guidelines outline staff responsibilities in the event of a threat to residents, guest or employees. Copies of these protocols will be kept in the front desk area and all staff will be expected to be familiar with them.

6-1 Emergency Protocol

- PATH will be staffed 24 hours a day, 7 days a week, to be responsive to resident crises and emergencies.
 - Emergencies include:
 - Threat of or actual violence
 - Property being seriously damaged/vandalized
 - Threat of suicide
 - Significant Mental Health/Substance Use Related crisis
 - Medical Emergency
 - Death in building
 - Fire, flood, tornado or any other natural disaster
- If there is physical violence, threat of immediate violent acts, or the presence of or stated intent to use a weapon, staff will immediately seek police intervention and contact the Property Manager and/or other designated personnel.
- When calling 911, be sure to ask that a CIT (Crisis Intervention Team) or CRT (Crisis Response Team) be sent to PATH. State the address clearly and that it is a mental health emergency.
- All staff will be trained in Mental Health First Aid and De-Escalation taught by Aurora Mental Health Center staff. Staff should strive to conduct themselves in a professional manner throughout the emergency.
- Staff must take suicidal statements, ideation, and attempts very seriously. Staff will contact trained professional providers to respond in an emergency.
- During a crisis intervention, it is best to have at least two people involved: one to take appropriate action depending on the nature of the crisis and one to document the event and/or call for assistance and/or support the lead person. All efforts will be made to resolve such events as quickly as possible.
- If an incident occurs, staff will check-in with residents who may have observed or been involved in crisis situations to ensure their safety. Staff will document and inform staff that need to follow-up, and provide post-crisis debriefing opportunities for residents. Confidentiality of the resident who experienced the crisis will be maintained. The focus then is on reinforcing resident safety, providing residents with a safe place to discuss the situation and opportunities to learn new ways of dealing with potential future situations.

- All emergency numbers will be continually updated and readily available to staff and residents.

An emergency bag will be stored at the front desk which includes a facility map, resident list, noting residents with limited mobility, list of resident service and companion animals, CPR mask, gloves, and flashlight.

6-2 Welfare Check

Welfare Checks are conducted when there is concern regarding the safety of the resident and/or condition of the apartment.

- Contact on-call supervisor with concerns
- If directed, notify the police of your concerns and ask if they would do a welfare check
- Follow up with supervisor on findings and any action necessary
- Document in appropriate communication log
- Staff will cooperate with emergency responders by allowing them access to the apartment via master key/code

6-1 APS/CPS

Michelle Dossey, contact at Department of Human Services	303-636-1710 x14980 mdossey@ arapahoegov.com
Adult Protective Services	303.636.1750
Child Protective Services	303.636.1750 Or 1.844.CO.4.KIDS

Section Seven: Facility Emergency Management

7-1 Fire Safety Plan

PATH Address:

15650 E. Alameda Parkway, Aurora, CO 80017

Action Steps:

1. At first sign of fire, get to safety and then immediately call 9-1-1. Remember to stay on the line long enough for the dispatcher to get the address.
2. Activate the Fire Alarm Pull Station if the fire alarm is not sounding. Fire Alarm Pull Stations are located throughout the building.
3. Notify the Property Manager/on call maintenance
4. Do not endanger your life. If the Fire Department instructs the residents to evacuate, do not under any circumstances allow re-entry without permission from Fire & Rescue personnel.
5. Direct residents and guests to appropriate gathering places (see program information below).
6. Be sure to grab “emergency bag” at the front desk in the event of an evacuation.
7. If due to mobility issues a resident is unable to exit the building direct them to the stairwells which are a place of refuge for up to 2 hours.

Facility Information

- PATH has 1 elevator that is equipped with an automatic firefighter’s return. This device recalls the elevators to the first floor.
- This building is also equipped with household smoke detectors, a wet sprinkler system with standpipes and an automated fire alarm system. The alarm system is extremely sensitive and when very little smoke is present it will set off the entire system, alerting residents to a possible fire.
- An emergency lock box containing an entry key is located outside of the front entrance. Fire and Rescue have keys to the box.

Evacuation Drills

- In cooperation with your local fire department, evacuation and/or safety drills will be conducted with staff and residents on an annual basis.

Utility Emergencies

Electric – City of Aurora:	800-895-2999
Water – Aurora:	303-326-8385
Gas – Xcel Energy:	800-895-2999

PATH does not have a generator, but does have some back-up power sources that will kick in automatically.

7-2 Severe Weather and Flood

Stay tuned to local weather broadcasts, use precaution and stay in communication with residents.

7-3 Elevator Outage

If someone is trapped inside elevator car, attempt to communicate with him/her. Inquire whether any injury has occurred. If injury or immediate danger exists, call 9-1-1 then assure the passenger that help is on the way. If the passenger is without injury, contact the maintenance technician for assistance. Give specific/complete location information to the maintenance technician and follow the instructions.

- Post 'Out of Operation' signage at main floor door to disabled car.
- Stay in contact with stranded occupant, if applicable.
- Make note of time elevator was checked, nature of problem, and any other concerns.
- If injuries to occupant, contact supervisor regarding situation and determine need for completion of Accident Investigation Report.
- Document contact to elevator contractor.
- Contact Maintenance staff and give update of the situation.
- Follow any applicable steps above.
- If no one is stuck in the inoperable elevator, please post an out of order sign and notify the Property Manager and the maintenance technician.

Section Eight: Building Security Plan

PATH has been designed with crime prevention in mind. In addition to physical considerations of building and common area placement, PATH has developed a plan to address the safety needs of the residents and the surrounding community.

8-1 Strategies and Actions

The following strategies and actions are planned for PATH maintaining a safe environment:

- 24/7 on-site staff one of whom will be stationed at the front office desk, will help monitor activities and respond to community issues. This staff member will screen guests, answer phones, assist with resident questions and problems and respond to all emergencies.
- PATH will continue its strong relationship with the Aurora Police Department in addressing crime issues in the community.

Aurora Police Contacts

Community Resource Officer, G. Boros 303.739.6353

Community Resource Officer, Michael Iovine 303.739.6336

Emergency (ask for a CIT or CRT to be sent to PATH): 911

8-2 Exterior Doors

Facility security is predicated on the ability to control physical access to the workplace and to specific locations inside the workplace at all hours. A fob system has been designed for the PATH front door. Please note: The fob system will deactivate during a power outage leaving the controlled doors unlocked.

All exterior doors will remain locked at all times. Residents and staff will use the front door to enter and exit the building with an electronic fob. The outer lobby is equipped with a system, on which guests ring the front desk requesting entry. Front Desk staff will notify residents when their guest arrives. The resident must come to the lobby to check in their guests. All guests will be required to check in and out at the front desk and be escorted by a resident at all times. Residents who are unable to escort service providers may receive assistance from a PATH employee.

8-3 Security Cameras

PATH has security cameras that scan common areas, corridors, laundry rooms, building elevator vestibules, main entrances, stairwells, parking lot and building perimeter. The cameras are monitored by staff.

Security Camera / Alarms Contractor: SMG

Video footage can be reviewed by police or emergency responders if requested. If emergency responders are requesting a copy of footage, they must go through the Property Manager and Director of Resident Services.

8-4 Staff Involvement

Unless there is an emergency, at least one staff person will be at the front desk at all times. If for some reason the front desk is vacant for what should be no longer than a few minutes, staff will:

- Lock down all computers that are on so that no information is available to anyone who might walk by.
- Put away and lock all material with resident information.
- Lock down the front door and post a sign noting that the front desk staff is not currently available to provide access to the entry door.
- Upon return immediately view security tape for the time period in which the desk was vacant to ensure that no guests entered into the building without signing in and approval.

Section Nine: Bed Bug Prevention

9-1 Heat Treatment “Hot Box” for Bed Bugs

PATH has purchased a large “hot box” to exterminate bed bugs and other insects from residents' belongings and furnishings using high-temperature heat. The Hot Box is used to prevent and manage bed bug infestations using high-temperature heat to effectively exterminate bed bug eggs, larva/nymphs and adults from resident’s belongings and furnishings such as mattresses, couches, dressers, and electronic devices. Managing bed bug infestations effectively is expensive and a major ongoing financial operating pressure. Use of the heat treatment room is documented in a separate document.

All new residents are expected to have their belongings heat treated. Those who refuse the treatment of their belongings will have their application denied.

All staff will be responsible to limit the risk of any infestation of insects within PATH. To reduce the risk of bedbug infestations within PATH, staff shall:

- Heat treat belongings that residents bring on to the premises at 140 degrees Fahrenheit (60 degrees Celsius) for at least 1 hour.

Any new items (other than furniture) brought into the building need to go through “hot box”. This is available on the first floor by the elevator, Monday and Thursday each week from 8:00am to 3:00pm.

9-2 Bedbug Mitigation Procedure

When bedbugs are identified within the building, the Property Manager is to be informed as soon as possible. A combination of preparation prior to treatment is recommended to effectively eliminate bed bugs. As soon as the room preparation is complete, the Property Manager will arrange professional pest control services. For heavy infestations, expect multiple treatments. Upon discovery that an apartment or area is likely infested with bedbugs, staff is to notify the Property Manager, and immediately implement segregation and treatment procedures. As soon as possible, and within 48 hours at the latest, the following treatment is to be implemented by designated staff.

- Launder all clothes and linens on hot settings. Transport in sealed bags to prevent movement of insects. Store in double sealed bags until laundered or the heat treatment has been completed.
- Remove all belongings from furniture, tables, wardrobes and closets. If free of bedbugs, store in tight fitting containers or double bag. Leave electronic equipment in place as they could ‘host’ insects.
- Move furniture to center of room, away from all walls and edges.
- Eliminate clutter using the double sealed bag process
- If a heavy infestation, mattresses and fabric furniture may have to be discarded after initial treatment. Mattresses or fabric furniture that are discarded are to be slashed significantly to reduce the risk of someone else’s utilizing them and

therefore spreading the infestation. Transport in sealed bags to prevent movement of insects.

Any area to be treated with pesticides is to be:

- Vacated during treatment
- After chemical treatment, the area is to be kept vacant for 4 to 8 hours (24 hours if person is pregnant, or has respiratory ailments, allergies or is sensitive to chemicals).

9-3 Staff Involvement

As with other issues, staff is to be as supportive and encouraging as possible during this process. Where a severe infestation exists, and the person refuses treatment, eviction may be possible.

EXHIBIT A: Eviction Policy and Prevention General Principles

As the Property Manager identifies housing issues and lease violations, he/she takes the necessary action to notify residents and inform the support services staff. The role of support services in this situation is to reach out to the resident and help him/her find a workable solution to the problem. All staff members are committed to supporting the residential stability of the residents whenever that is possible.

In order to avert problems before they reach a crisis stage, both the Property Manager and support services staff will review any resident issues, and jointly meet with the resident to discuss the problem. The Property Manager will then take the appropriate action according to the steps outlined in this Exhibit. The Property Manager will consult with legal counsel when necessary. Copies of any of legal notices are forwarded to the Director of Resident Services, as well as to the resident.

The support services staff will attempt to engage the resident and help him/her develop a solution that fits the problem. Often, this process will include a joint meeting with the resident, the Property Manager and the support services staff. An eviction prevention plan may be created by all parties involved so that there is a clear understanding of expected changes and who is responsible.

For instance, if residents are not able to remedy the rent payment problem, a joint meeting may focus on financial management and ways to make payment of rent a priority. In the same way, the property manager and the Director of Resident Services will make attempts to intervene when there are noise or disturbance complaints about a resident, including referrals to mental health or substance abuse services. If no intervention is successful, the resident may face eviction. Both the property manager and the Director of Resident Services work closely together to bring these issues to the attention of the resident at a joint meeting with the resident. This process can result in the resolution of problems that would have led to eviction without intervention.

All lease violations will be substantiated with documentation, e.g., resident complaints, neighbor complaints to management, emails, photos, and police reports. Residents have the option to sign a mutual lease rescission at any time if they feel they cannot comply with the lease terms. They may move without penalty and the move out date will be negotiable.

Eviction Procedures:

PATH staff is dedicated to:

- Ensuring the safety of all residents and staff; and
- Maintaining stable housing for all residents when that is possible without jeopardizing safety.

With these considerations in mind, lease violations have been divided into four categories:

- Incidents where there is a lease violation and no victim.
- Incidents where a lease violation occurs, as well as annoyance to neighbors and infringement to peaceful enjoyment.
- Incidents that occur on or near the premises and endanger the person or willfully and substantially endanger the property of the landlords, any co-resident, or any person living on or near the premises.
- Incidents that occur on or near the premises and constitute a violent or drug-related felony which endangers the health or safety of the other residents.

Category 1 and Category 2 violations are subject to the following steps, aimed at allowing the resident to resolve any problems and maintain stable housing:

- First Step – Communication

The Director of Resident Services will contact the resident and meet over the phone or in person, per resident's preference. The violation will be discussed, as well as the resident's other responsibilities under the lease. The Director of Resident Services and/or care manager will document the file with a memo as to nature of violation and results of the discussion. This step may be repeated based on the resident's cooperation and nature of the violation.

- Second Step – Lease Violation Notice.

The Property Manager will contact the resident and request a meeting. The violation will be reviewed, as well as the resident's other responsibilities under the lease. The Property Manager will document the meeting with a written summary which documents the violation, the results of the discussion, and any agreements made with the resident. The resident will be served with a Lease Violation Notice. An Eviction Prevention Plan may be initiated by the service staff or requested by the resident.

- Third Step – Demand for Compliance or Possession.

If the matter is not resolved following the first or second step, the Property Manager will contact the resident and arrange a meeting. Whether or not the resident attends the meeting, the resident will be served a Demand for Compliance or Possession). This notice gives the resident three days in which to cure the lease violation. The notice will remain in effect for one year. The resident will be warned that if there are future violations of the same lease provision within the year, the resident will be served with a 3 Day Notice to Quit. If the resident does not feel he/she can comply with the lease, a mutual rescission will be offered.

- Fourth Step – Termination of Tenancy.

If the Resident is unable to cure the lease violation, or if there is a Category 3 or 4 lease violation (a Substantial Violation) of the lease, the manager will verify with PATH attorney that collected documents are sufficient to warrant a Demand for Possession.

If resident requests meeting, management will meet with resident. A mutual rescission will be offered. If resident does not accept mutual rescission, the resident file will be forwarded to the attorney's office to proceed to the court eviction process.

Lease violations in Categories 3 and 4 which jeopardize the safety of residents and staff, are not subject to Steps 1 through 3. In such cases, the Property Manager will proceed directly to Step 4 of the eviction procedure.

PATH Housing Stabilization (Eviction Prevention) Plan

Resident Name: _____

Date of Incident(s): _____

Unit Number: _____

Today's Date: _____

Brief Description of Incident(s):

How did this behavior affect other residents and/or the PATH building or program?

How did this behavior/incident affect you?

Steps that Resident agrees to take to prevent this type of problem from continuing in the future: *(Include deadlines and timelines when appropriate)*

1.

2.

3.

If all else fails, what else can I do to prevent lease violations or other serious consequences?

People or Agencies that Resident can contact if I feel that I am in (or close to) Crisis or needing help:

1. _____

Phone number: _____

2. _____

Phone number: _____

3. _____

Phone number: _____

How can the service staff at PATH best support you to move forward and prevent other incidents from occurring?

Resident Signature: _____

PATH Staff Signature: _____

EXHIBIT B: Overnight Guest Policy

Resident(s):	Date:
Apartment Address:	

The following Overnight Guest Policy ("Addendum") is attached and made part of the Lease Contract Agreement ("Lease") between Landlord and Resident dated _____. Any conflict between the terms of the Lease and this Addendum, the terms of this Addendum shall control.

Residents are permitted to have approved overnight guests stay in their unit for a total of (14) days within a 12-month period. An approved guest is someone who has not been evicted from the property, who is not on the "banned from the building" list and/or is not on the no trespass list. Resident must register their guest at the front desk when a front desk is present in a building. If there is no front desk or property management on site, registering the guest will not be required however any extended visits beyond 14 days will require the resident to contact the off-site property manager to obtain approval.

If resident has exceeded their overnight guest days, they can ask for approval from property management for additional days. Property Manager has the discretion to approve or deny a resident's request for guests and/or extended stays.

Residents are responsible for the conduct and actions of their guests and are liable for any damages to the property that they may cause. Guests must obey all rules and are not allowed to travel throughout the building without being accompanied by the resident.

Residents are permitted to have daytime guest(s) visit their household during the hours of 8:00am and 11:00pm.

Temporary NO Guest Policy - At the discretion of property management, we reserve the right to temporarily suspend a resident's privilege for guests. If management feels the need, they can temporarily suspend all overnight visitors' privileges in the building if they feel this is needed to regain order. If this is implemented, no visitors will be allowed in the building between the hours of 11pm – 8:00am. Residents who bring problematic or disruptive guests into the community could also be issued a lease violation.

Resident Signature

Date

Resident Signature

Date

Owner/Agent

Date



Verification of Need for Reasonable Accommodation

Participant's Name: _____ Last four SSN: _____

Date: _____

The individual listed above has identified him/herself as being a person with a disability and has requested an accommodation from the Division of Housing (DOH) in order to have an equal opportunity to benefit from its housing programs. An accommodation must be reasonable and there must be an identifiable relationship between the requested accommodation and the applicant or participant's disability. You have been authorized to release information to us regarding the need for an accommodation. (Please see the Authorization to Release Information accompanying this form).

Section 504 of the Rehabilitation Act and the Fair Housing Amendments Act define a disability as a physical or mental impairment which substantially limits one or more of a person's major life activities, a record of having such impairment, or being regarded as having such an impairment.

1. Does this individual have a disability, as defined above? Yes No

2. Describe how the requested reasonable accommodation on the attached Request for Reasonable Accommodation form is necessary to afford this individual the opportunity to access housing, maintain housing, or for full use and enjoyment of the housing.

3. Is the accommodation requested directly related to the participant's disability? Yes No

Name and address of person completing form:

Printed Name: _____

Title: _____

Address: _____

Telephone Number: _____

Fax number: _____

Signature: _____

Date: _____

Note: Please attach additional pages if necessary to provide any additional information that may assist us in reaching a decision.





NOTICE OF RIGHT TO REASONABLE ACCOMMODATION

Division of Housing

In accordance with the Americans with Disabilities Act (ADA) and the Fair Housing Act, it is the policy of Division of Housing (DOH) to provide reasonable accommodations for applicants and participants with disabilities, when necessary, to ensure an equal opportunity to participate in or benefit from DOH housing programs.

A reasonable accommodation is a change, adaptation or modification to a policy, program or services which will allow a person with a disability as defined under the federal civil rights law the equal opportunity to participate fully in DOH's housing programs. Federal regulations require that requests for accommodations be considered reasonable if they do not create an undue financial and administrative burden for DOH, or result in a fundamental alteration in the nature of the program. There must also be an identified relationship between the required accommodation and the individual's disability.

A person with a disability, as defined under federal civil rights law, is any person who:

- Has a physical or mental impairment that substantially limits one or more major life activities, or
- Has a record of such impairment, or
- Is regarded as having such impairment

For reasonable accommodations, disability status and the need for a reasonable accommodation must be verified and documented initially by a knowledgeable professional. A request for continued need must be completed annually by or on behalf of the participant.

Examples of a reasonable accommodation may include:

- Providing time extensions for locating a unit
- Permitting participants to rent from a relative
- Permitting participants to have a live-in aide
- Exception payment standards for accessible units

Requests for accommodations must be assessed on a case-by-case basis, taking into account factors such as the cost of the requested accommodation, the financial resources of DOH at the time of the request, the benefits that the accommodation would provide to the family, and the availability of alternative accommodations that would effectively meet the family's disability-related needs.

If you or a member of your household have a disability and require an accommodation, you may request it, in writing, at any time during the application process or after admission. You may obtain a Request for Reasonable Accommodation form from your local residential coordinator or by contacting DOH at:

Division of Housing
1313 Sherman, Room 320
Denver, CO 80203
303.864.7852 (phone)
303.864.7857 (fax)

DOH will respond to your request within ten (10) business days from the date the request was received. If additional information is necessary, you will receive a written request from DOH outlining what is needed. Whether your request is approved or denied, you will be notified in writing. Should your request be denied, you have the right to appeal the decision.





Request for Reasonable Accommodation

Head of Household: _____

Person requesting a Reasonable Accommodation: _____

Address: _____ Phone: _____

Section 504 of the Rehabilitation Act and the Fair Housing Amendments Act defines a “disability” as a physical or mental impairment which substantially limits one or more of a person’s major life activities, a record of having such impairment, or being regarded as having such an impairment.

1. Based on the above definition I consider myself to be an individual with a disability.
 Yes No
2. As a result of my disability, I am requesting a reasonable accommodation in order to have an equal opportunity to participate in, or benefit from, Division of Housing (DOH).
 Yes No

3. As a result of my disability, I am requesting the following accommodation in order to have an equal opportunity to participate in DOH’s housing programs: _____

4. As a result of my disability, the above accommodation is necessary because: _____

5. Verification Information: Please provide DOH with the contact information of a knowledgeable professional who can verify the disability and the need for the requested reasonable accommodation:

Name: _____ Title: _____

Address: _____

Phone: _____ Fax: _____

Authorization to Release Information: I authorize the individual/care provider listed above to disclose relevant information to Division of Housing verifying that I have a disability and need the accommodation I have requested. I understand that the information that DOH obtains will be kept confidential and used solely to determine if an accommodation should be provided.

Name of Participant: _____

Signature of Participant: _____ Date: _____

Please return this form to: Colorado Division of Housing
 1313 Sherman St. Room 320
 Denver, CO 80203



Providence at the Heights (PATH)
15650 E. Alameda Parkway
Aurora, CO 80017

Authorization to Request/Release Information

Name: _____ DOB: _____ SSN: _____

I hereby authorize Providence at the Heights (PATH) to:

And/OR

- Obtain confidential information from
 Release confidential information to

the following listed agency/organization/individual.

Contact Name: _____

Agency Name: _____

Address: _____

The confidential information exchanged will be used for the purpose of:

<input type="checkbox"/>	Continuity of Care
<input type="checkbox"/>	Verbal Exchange <i>only</i> of information for continuity of care
<input type="checkbox"/>	Emergency use <i>only</i>
<input type="checkbox"/>	Other: _____

Specific information to be released:

<input type="checkbox"/>	Psychological Information	<input type="checkbox"/>	Psychological Evaluation
<input type="checkbox"/>	Discharge Summary	<input type="checkbox"/>	Medical History
<input type="checkbox"/>	Service Plan(s)	<input type="checkbox"/>	Psychiatric Evaluation
<input type="checkbox"/>	Medication History	<input type="checkbox"/>	Benefit Verification
<input type="checkbox"/>	Verbal or Written Progress in Treatment	<input type="checkbox"/>	Chemical Abuse and/or Dependency
<input type="checkbox"/>	AIDS/HIV Testing	<input type="checkbox"/>	X-Ray/Lab Data
<input type="checkbox"/>	Confirmation in presence of treatment for: _____		
<input type="checkbox"/>	Other (please specify) _____		

I understand that information to be released may include information regarding the following conditions:

<input type="checkbox"/>	Psychological/Psychiatric Conditions	<input type="checkbox"/>	Alcohol/Drug Abuse or Dependence
<input type="checkbox"/>	HIV Testing or AIDS	<input type="checkbox"/>	Alcohol/Drug Treatment

I understand this information is protected by law and will be handled according to state and federal confidentiality standards. If the information to be released pertains to the diagnosis and treatment of alcoholism and/or drug abuse, I understand that confidentiality of the information is protected by Federal Law 42 CRS Part 2.

Authorization: I certify that this request has been made voluntarily. I understand that I may revoke this authorization in writing at any time, except to the extent that action has been taken to comply with it. I understand that this consent will expire upon _____ or, if left blank, in 90 days. I hereby release the provider from any liability, which may result from furnishing the information requested as authorized in this release. A copy of this authorization is to be considered as valid as the original.

Signature of Individual served

Date

Witness/Title

Date

SCC - PATH ORG. CHART

Second Chance Center
✔ Hassan Latif
Executive Director

PATH Service

PATH Asset Management

Director of Resident Services
Wanda Harrison

Providence Residences LLC
Ben Bryan

Care Managers

Peer Navigator

Front Desk

Housing Coordinator

✔ Rachel Burns

✔ Sandy Maynard

✔ TBD

✔ Adam Abdullah

✔ Sharee McNeely

✔ Debra Morton

✔ Denise Reynsono

✔ Jeannette Baker

✔ Muntizire Bey

BlueLine Property Management, LLC

Nate Richmond – 50% member, President,
Development Interface with BLD

Kelly Gill – 50% member, Vice President,
Operations, Asset Management

Nate Shepard -authorized signer
Accounting Interface with BLD

Darlene Piszczek- Director of
Property Management

Oriana Sanchez – Vice President of
Property Management Operations

Elizabeth Hannum –
Assistant Director

Cameron Rokich -
Accounting

– Regional Manager

Kelly Abbey – Property
Manager

Tina Patillo – Property
Manager

Adriana Segundo
Property Manager

Christina Diaz-
Property Manager

Tracy Ryba
Assistant Manager

Anthony Maez -
Maintenance

Ramon Montoya -
Maintenance

Calib Chewing
Maintenance

Patrick Sena –
Maintenance

OWNERS' ACKNOWLEDGEMENT

The undersigned acknowledge that these operational policies and procedures were developed with the input from all parties involved, in order to benefit the residents and staff at Providence at the Heights. We the undersigned agree to follow the procedures outlined in this manual and have front-line staff at PATH familiarize themselves with the entire manual. The content of the manual will be re-visited on an annual basis and updates will be made as necessary.

Owner, Second Chance Center, Signature

Date

Owner, BlueLine Development, Signature

Date

BlueLine Property Management Representative

Date

PATH Supportive Services Representative

Date