



Admissions and Continued Occupancy Policy Supplemental Policies

**Detroit Housing Commission
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Approved by the Board of Commissioners April 13, 2017
Effective 7/1/2017 Resolution # 2906**



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STATEMENT OF POLICIES AND OBJECTIVES

A. Introduction

The Public Housing Program was created by the U.S. Housing Act of 1937. Administration of the Public Housing Program and the functions and responsibilities of the Detroit Housing Commission (“DHC”) staff shall be in compliance with DHC’s Personnel Policies, any applicable union agreements and the Admissions and Continued Occupancy Policy (“ACOP”). The administration of DHC’s Public Housing Program will also comply with the requirements of the Department of Housing and Urban Development (“HUD”). Such requirements include any Public Housing regulations, Handbooks, Guidebooks, applicable Notices, and all applicable Federal, State and local laws, including Fair Housing laws and regulations. Applicable Federal laws or regulations shall supersede provisions in conflict with these Supplemental ACOP Policies.

B. DHC Mission Statement

DHC Mission Statement

The Detroit Housing Commission will effectively and efficiently develop, manage and preserve quality affordable housing.

DHC’s Vision

- a. Develop and Maintain Community Partnerships
- b. Promote High Quality Customer Service
- c. Sustain Sound Fiscal Management
- d. Ensure Operational Sustainability

C. DHC Objectives

These Supplemental ACOP Policies are designed to demonstrate that DHC is managing its program in a manner that reflects its commitment to improving the quality of housing available to its customers, and its capacity to manage housing in a manner that demonstrates its responsibility to the public trust. In addition,

these Supplemental ACOP Policies are designed to achieve the following objectives:

- To provide improved living conditions for very low and low income families while maintaining rent payments at an affordable level.
- To operate a socially and financially sound public housing agency that provides decent, safe, and sanitary housing within a drug free, suitable living environment for its customers.
- To avoid concentrations of economically and socially deprived families in any one or all of DHC's public housing developments.
- To lawfully deny the admission of applicants, or the continued occupancy of residents, whose habits and practices reasonably may be expected to adversely affect the health, safety, comfort or welfare of other residents or the physical environment of the neighborhood, or create a danger to DHC employees.
- To attempt to have a resident body in each development that is composed of families with a broad range of incomes and rent-paying abilities that are representative of the range of incomes of low-income families in DHC's jurisdiction.
- To provide opportunities for upward mobility of families who desire to achieve self-sufficiency.
- To facilitate the judicious management of DHC inventory and the efficient management of DHC staff.
- To ensure compliance with Title VI of the Civil Rights Act of 1964 and all other applicable Federal laws and regulations so that admissions and continued occupancy are conducted without regard to race, color, religion, sex, national origin, disability, familial status, marital status, sexual orientation, or gender identity.

CUSTOMER SERVICE POLICY

The Detroit Housing Commission (“DHC”) is committed to providing a high level of customer service in the administration of its public housing program.

Applicants and Residents who are not satisfied with the level of services provided by DHC staff at any time are encouraged to file a written complaint at DHC’s Central Office located at 1301 East Jefferson, Detroit, Michigan 48207. You may wish to contact us directly by phone during normal business hours from 8:30 a.m. to 4:30 p.m. at (313) 877-8000, TDD/TTY telephone number is (800) 222-3679.

HOUSEKEEPING STANDARDS POLICY

The Detroit Housing commission (“DH”) shall, at least annually, conduct a housekeeping inspection of all of its dwelling units. The following housekeeping standards apply to all DHC dwelling units:

A. Inside Unit

1. General

- a. Walls: should be clean, free of dirt, grease, holes, cobwebs, and fingerprints.
- b. Floors: should be clean, clear, dry and free of hazards,
- c. Ceilings: should be clean and free of cobwebs.
- d. Windows: should be clean and not nailed shut. Shades and blinds should be intact.
- e. Woodwork: should be clean, free of dust, gouges, or scratches.
- f. Doors: should be clean, free of grease and fingerprints. Doorstops should be present. Locks should work.
- g. Heating units: should be dusted and access uncluttered.
- h. Trash: shall be disposed of properly and not left in the unit.
- i. Entire unit: should be free of rodent or insect infestation.

2. Kitchen

- a. Stove: should be clean and free of food and grease.
- b. Refrigerator: should be clean. Freezer door should close properly and freezer should have no more than one (1) inch of ice.
- c. Cabinets: should be clean and neat. Cabinet surfaces and counter tops should be free of grease and spilled food. Cabinets should not be overloaded. Storage under the sink should be limited to small or lightweight items to permit access for repairs. Heavy pots and pans should not be stored under the sink.
- d. Exhaust fan: should be free of grease and dust.

- e. Sink: should be clean, free of grease and garbage. Dirty dishes should be washed and put away in a timely manner.
 - f. Food storage areas: should be neat and clean without spilled food.
 - g. Trash/garbage: should be stored in a covered container until removed to the disposal area.
3. Bathroom
- a. Toilet and tank: should be clean and odor free.
 - b. Tub and shower: should be clean and free of excessive mildew and mold. Where applicable, shower curtains should be in place and of adequate length.
 - c. Lavatory: should be clean.
 - d. Exhaust fans: should be free of dust.
 - e. Floor: should be clean and dry.
4. Storage areas
- a. Linen closets: should be neat and clean.
 - b. Other closets: should be neat and clean. No highly flammable materials should be stored in the unit.
 - c. Other storage areas: should be clean, neat and free of hazards.

B. Outside the Unit

- 1. Yards: should be free of debris, trash, and abandoned cars. Exterior walls should be free of graffiti.
- 2. Porches (front and rear): should be clean and free of hazards. Any items stored on the porch shall not impede access to the unit.
- 3. Steps (front and rear): should be clean and free of hazards.
- 4. Storm doors: should be clean, with glass or screens intact.

5. Sidewalks: should be clean and free of hazards.
6. Parking lot: should be free of abandoned vehicles. There should be no vehicle repairs in the lots.
7. Hallways: should be clean and free of hazards.
8. Stairwells: should be clean and uncluttered.
9. Laundry areas: should be clean and neat. Remove lint from dryers after use.
10. Utility room: should be free of debris, motor vehicle parts and flammable materials.

PHOTO IDENTIFICATION POLICY

The Detroit Housing Commission (“DHC”) will issue official photo identification cards (“Photo ID”) to all of its Residents of public housing 12 years or older (“Resident”), as well as nay Live-in Aides, for the safety and security of DHC Residents and employees.

DHC will issue all Residents a Photo ID at the time of Lease execution or at the time a Resident requiring a Photo ID under this policy is added to the Lease. DHC will also issue a Photo ID to a Live-in Aide at the time of approval by management for the Resident to have a Live-in Aide. Upon separation of services for the Resident or if the Resident moves out, the Live-in Aide must turn in the Photo ID to the manager’s office. **Note:** The provision of a Photo ID to a Live-in Aide does make the Live-in Aide a DHC Resident.

Minors shall have a photograph taken for the Photo ID at the recertification immediately before the minor’s 12th birthday. Minors shall have a photo taken every three (3) years at recertification until they reach the age of 18.

The Photo ID will be imprinted with the photograph, name and unit identification number. All Residents and Live-in Aides shall carry their Photo ID with them at all times while on DHC property.

Residents and Live-in Aides shall immediately report the loss of a Photo ID to DHC personnel or an authorized DHC agent. A replacement card will be issued and a fee of \$5.00 will be assessed.

The Photo ID must be displayed or surrendered upon request of DHC management or staff, or local law enforcement officers, or an authorized DHC agent.

Upon the cessation of DHC residence, all Photo IDs must be turned into the rental office as part of the move out procedures. If a household fails to turn over any member of the household’s photo ID, a fee of \$5.00 per card will be assessed.

Willful failure or refusal to have a photograph taken for the purposes of issuance of a Photo ID or to produce the photo ID upon the request of DHC management or staff or an authorized DHC agent is a material breach of the Lease and may result in termination of the Lease.

DHC’s properties are the following sites/buildings/locations:

Algonquin.

Brewster Homes

Forest Park

Diggs Homes

Douglass Homes

Harriet Tubman

Green Brooke

Riverbend

Sheridan I & II

Sojourner Truth

State Fair

Warren West

Woodbridge Senior Village

Scattered Sites, as well as any mixed-financed properties, are exempt from this policy.

When a Resident or Live-in Aide arrives at a DHC property without the Photo ID, he/she will be assisted by either a DHC employee or an authorized DHC agent.

If the individual states that he/she has forgotten his/her card, DHC employee or authorized DHC agent will ask for another government issued photo identification card or passport. DHC employee or authorized DHC agent will check the name against the current DHC roster of family members, and if the identification is verified, will permit access to DHC property. If DHC personnel or the authorized DHC agent is unable to verify tenancy via the list, entry will be denied and the unidentified individual will be instructed to report to the rental office during normal business hours to gain access to the property.

If an individual leaves the Photo ID in his/her vehicle, she/he will be instructed to return to the vehicle and retrieve the card before being allowed access to DHC property. If the individual is unable to retrieve the card, she/he will be denied access to the property.

OUTDOOR TRASH AND LITTER POLICY

For scattered site homes and row houses, Resident shall be responsible for maintaining the area in front of and in the rear of their assigned units. These areas must be free of all trash and litter, including leaves. Resident shall be responsible for maintaining the area in front of the unit which starts at the front entry door to the middle of the street or courtyard. The area to maintain in the rear of the unit starts at the rear entry door to the middle of the street (alley) or courtyard. Any lawn areas or sidewalks next to the assigned units are not to be used as storage for trash. This includes but is not limited to old tires, bicycles, automobile parts and furniture.

Pursuant to DHC's Schedule of Resident Charges, failure to maintain the Resident's assigned area by allowing litter and/or trash to remain will result in an initial fine of \$54 for the first offense. The second offense will result in a \$74 fine. Any occurrences after the second offense will result in termination of the Lease.

Trash containers are not to be put out until after 5:00 p.m. pick-up and returned to the unit by 9:00 p.m. the day after the trash is picked up. All trash put in the containers must be in a bag.

DHC will provide bulk trash pickup in its developments but not at its scattered site homes.

Residents in all high-rise buildings shall keep the area in front of their entry door free of debris and litter. Failure to comply will result in the aforementioned fines.

REASONABLE ACCOMMODATION POLICY

A. Policy Statement

The Detroit Housing Commission (“DHC”) is committed to ensuring that its policies and procedures do not deny individuals with disabilities the opportunity to participate in, or benefit from, nor otherwise discriminate against individuals with disabilities, on the basis of disability, in connection with the operations of DHC’s programs, services and activities. Therefore, if an individual with a disability requires a reasonable accommodation such as an accessible feature or modification to a DHC policy, DHC will provide such reasonable accommodation unless doing so would result in a fundamental alteration in the nature of the program, an undue financial or administrative burden, or a direct threat.

A reasonable accommodation is a change, modification, alteration or adaptation in policy, procedure, practice, program, or facility that provides a qualified individual with a disability the opportunity to participate in, or benefit from, a program (housing or non-housing) or activity.

DHC will post a copy of this Reasonable Accommodation Policy in its Central Administrative Offices, the offices of its private management companies, and the management office in each development. In addition, individuals may obtain a copy of this Reasonable Accommodation Policy, upon request, from DHC’s Section 504/ADA Coordinator.

B. Legal Authority

DHC is subject to Federal civil rights laws and regulations. This Reasonable Accommodation Policy is based on the following statutes or regulations. Section 504 of the Rehabilitation Act of 1973 (Section 504), Title II of the Americans with Disabilities Act of 1990 (ADA), the Fair Housing Act of 1968, as amended (Fair Housing Act), the Architectural Barriers Act of 1968, and the respective implementing regulations for each statute.

C. Monitoring and Enforcement

DHC’s Section 504/ADA Coordinator is responsible for monitoring DHC’s compliance with this policy. Individuals who have questions regarding this policy, its interpretation or implementation should contact DHC’s Section 504/ADA Coordinator in writing, by telephone or by appointment, as follows:

Office of the 504/ADA Coordinator

DHC ACOP Supplemental Policies (effective July 1, 2017)

1301 E. Jefferson
Detroit, Michigan 48207
(313) 877-8000

D. Staff Training

The Section 504/ADA Coordinator will ensure that all appropriate DHC staff receives annual training on the Reasonable Accommodation Policy including all applicable Federal, state and local requirements regarding reasonable accommodation.

E. Requesting a Reasonable Accommodation

An applicant with a disability may request a reasonable accommodation at any time during the application process. A Resident with a disability may request a reasonable accommodation at any time. Individuals may submit their reasonable accommodation request in writing, orally, or by any other equally effective means of communication. However, DHC will ensure that all reasonable accommodation, DHC will assist the individual in completing the request.

F. Disability Defined

An individual with a disability is defined by the ADA as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having such an impairment.

“Major life activities” mean functions such as caring for ones self, performing manual tasks, walking, seeing, hearing, speaking, breathing and learning.

The definition of disability does not include any individual who is an alcoholic whose current use of alcohol prevents the individual from participating in the public housing program or activities or whose participation, by reason of such current alcohol abuse, would constitute a direct threat to property or the safety of others.

G. Examples of Reasonable

Reasonable accommodation methods or actions that may be appropriate for a particular individual may be found to be inappropriate for another individual. The decision to approve or deny a request for a reasonable accommodation is made on a case-by-case basis and takes into consideration the disability and the needs of the individual as well as the nature of the program or activity in which the individual seeks to participate.

Examples of reasonable accommodations may include, but are not limited to:

1. Making a unit, part of a unit or public and common use elements accessible for the head of household or a household member with a disability who is on the Lease.
2. Permitting a family to have a service or assistance animal necessary to assist a family member with a disability.
3. Allowing a live-in aid to reside in an appropriately sized DHC unit.
4. Transferring a Resident to an appropriate.
5. Issuing a Housing Choice Voucher,
6. Making documents available in large type, computer disc or Braille.
7. Providing qualified sign language interpreters for applicant or Resident meetings with DHC staff or at Resident meetings.
8. Installing strobe type flashing lights and other such equipment for a family member with a hearing impairment; or
9. Permitting an outside agency or family member to assist a Resident or an applicant in meeting screening criteria or meeting essential lease obligations.

H. Processing of Reasonable Accommodation Request

DHC will provide the “Request for Reasonable Accommodation”, (“Request Form”), to all applicants or Residents with disabilities who request a reasonable accommodation. The Request Form includes various forms of reasonable accommodations as well as the general principles of reasonable accommodation.

1. DHC will provide all applicants with the Request Form as an attachment to the DHC application. Upon request, the Request Form must be provided in an alternative format.
2. Reasonable accommodations will be made for applicants during the application process. All applications will be taken in an assessable location. Upon request, applications will be made available in accessible formats and appropriate auxiliary aids and services, including qualified sign language interpreters, will be made available.
3. DHC will provide all Residents with the Request Form during the annual re-certification and upon request. DHC will provide the Request Form in an alternate form upon request.
4. Residents seeking accommodation(s) may contact the Site Manager. In addition, Residents may also contact the Section 504/ADA Coordinator’s office directly to request an accommodation. Residents residing in DHC developments managed by private management companies are to make their requests for reasonable accommodation to the private management company which will be responsible for responding to the request.
5. Within five (5) business days of receipt, the Site Manager will forward the Resident’s reasonable accommodation request and supporting documentation, if any, to the Section 504/ADA Coordinator. The Site Manager shall also submit a recommendation on whether the request should be approved or denied.
6. Within ten (10) business days of receipt, the 504/ADA Coordinator will acknowledge receipt of the Resident’s Request to the Resident.
7. If additional information or documentation is required, the Section 504/ADA Coordinator will notify the Resident, in writing, of the need for additional information or documentation. The Section 504/ADA Coordinator will provide the Resident with a “Request for Information or Verification form” (Request for Information). The written notification will provide the Resident with a reply date for submission of the outstanding information or documentation.

8. Within thirty (30) business days of receipt of the request and, if necessary, all supporting documentation, the Section 504/ADA Coordinator will provide written notification to the Resident of the decision to approve or deny the Resident's request(s). Upon request, the written notification will be provided in an alternate format.
9. If the Section 504/ADA Coordinator approves the accommodation request(s), the Resident will be notified by the Site Manager of the projected date for implementation.
10. If the accommodation is denied, the Resident will be notified of the reasons for denial. In addition, the notification of the denial will also provide the Resident with information regarding DHC's Grievance Policy.
11. All requests that have been approved by the 504/ADA Coordinator will be forwarded to the appropriate Site Manager for implementation. All approved requests for reasonable accommodation will be promptly implemented or will promptly begin the process of implementation.

I. Verification of Reasonable Accommodation Request

DHC may request documentation of the need for a reasonable accommodation. In addition, DHC may request that the requester provide suggested reasonable accommodations.

DHC may verify a requester's disability only to the extent necessary to ensure that the requester has a disability based need for the requested accommodation. However, DHC may not require the requester to disclose confidential medical records in order to verify a disability. In addition, DHC may not require specific details regarding the requester's disability. DHC may only request documentation to confirm the disability based need(s) for the requested reasonable accommodation(s). DHC may not require individual's disability(ies).

The following may provide verification of a requester's disability and the need for the requested accommodation(s):

1. Physician;
2. Licensed health professional;
3. Professional representing a social service agency; or
4. Disability agency or clinic.

J. Denial of Reasonable Accommodation Requests

Requested accommodation will not be approved if any of the following would occur as a result:

1. A violation of State and/or federal law.
2. A fundamental alteration in the nature of DHC's public housing program.
3. An undue financial and administrative burden on DHC.
4. A structurally infeasible alteration; or
5. An alteration requiring the removal or alteration of a load-bearing structural member.
6. In exceptional cases, where DHC has provided a Housing Choice Voucher as a reasonable accommodation, DHC may ask the Assistant Secretary for Public and Indian Housing of HUD for an exception payment standard amount over 120% of the fair market rent, provided the requester provides the appropriate supporting documentation.

K. Service or Assistance Animals

Residents of DHC with disabilities are permitted to have assistance animals if the animals are necessary as a reasonable accommodation for their disabilities. DHC Residents or applicants who need an assistance animal as a reasonable accommodation must request the accommodation in accordance with this policy. Assistance animals are not subject to the requirements of DHC's Pet Policy.

L. Right to Appeal/Grievance Process

1. A Resident or applicant may file a complaint pursuant to DHC's Grievance Policy following a formal determination by the Section 8 540/ADA Coordinator.
2. A Resident or applicant may, at any time, exercise their right to appeal a DH decision through the local HUD office or the U.S. Department of Justice.

Fair Housing and equal Opportunity Office
477 Michigan Avenue
Detroit, Michigan 48226
(313) 226-7900, TTY (313) 226-6899

ONE STRIKE POLICY

The Detroit Housing Commission (“DHC”) fully endorses and implements a “One Strike, You’re Out” Policy designed to create and maintain a safe and drug-free community and keep Residents and DHC employees free from threats to their personal and family safety. Obeying the law and abstaining from illegal criminal and drug activities are conditions upon which DHC Residents agree as part of their residency in public housing. Failure of a Resident or other family members living in the household, or visitors or guests, to meet these obligations constitutes a violation of a Resident’s Lease and is grounds for eviction.

A. Administration and Screening of Applicants

All screening and eviction procedures shall be administered fairly and shall not discriminate on the basis of race, color, national origin, religion, age, sex, familial status, or disability and shall not violate a Resident’s right to privacy. This policy shall be posted in each development and administrative office and shall be readily available to any Resident or Applicant upon request.

DHC will screen applicants thoroughly and fairly in an effort to prevent drug-related and other criminal activity that pose a threat to the health and safety or right to peaceful enjoyment of the premises by other Residents or DHC employees. The screening will apply to all members of the household who are 18 years of age or older. If information is revealed in a criminal history record that would cause DHC to deny housing to the applicant or a member of his/her household, DHC will provide a copy of the record to the person for whom the record was received. If the information is disputed, the person shall be given an opportunity for an informal hearing as outlined in the ACOP.

Evidence of drug-related or other criminal activity which would pose a threat to the health, safety or right to peaceful enjoyment of the premises by other Residents or DHC employees shall be considered grounds for denial of housing. Reasonable cause to believe that a person’s pattern of alcohol abuse would pose a threat to the health, safety or right to peaceful enjoyment of the premises by other Residents or DHC employees shall also be considered grounds for denial of housing. DHC may waive its policy of prohibiting admission if the applicant demonstrates to DHC’s satisfaction that he/she is no longer engaging in the illegal use of a controlled substance or abuse or alcohol and has either successfully completed a supervised rehabilitation program, has otherwise been successfully rehabilitated or is currently participating in a supervised rehabilitation program.

If, at any time during occupancy, DHC has reasonable cause to believe that a household member is engaging in drug-related or other criminal activity which

would pose a threat to the health, safety or right to peaceful enjoyment of the premises by other Residents or DHC employees, DHC may run a subsequent criminal check on that household member. DHC will also order a criminal history on any individual 18 years or older who is added to the Lease after initial occupancy.

Persons evicted from any public housing assistance program because of drug-related criminal activity are ineligible for admission to public housing for a three (3) year period beginning the date of the eviction. This may be waived if the applicant or a member of his/her household demonstrates successful completion of a rehabilitation program approved by DHC or the circumstances leading to the eviction no longer exist (for example, the individual involved in drugs is no longer a household member because of incarceration).

Evidence that an applicant or a member of his/her household is subject to a lifetime registration requirement under a state sex offender registration program shall be grounds for denial of housing. Evidence that any household member has been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing shall be grounds for permanent denial of housing.

All criminal records received will be maintained confidentially and while needed, will be housed in a locked file with restricted access. Misuse of the above information by any DHC employee will be grounds for termination of employment and may subject the employee to legal penalties. The criminal history reports shall be destroyed as soon as the Applicant is housed or upon completion of the hearing or due process procedures once a final determination is made.

B. Evictions

The Provisions of this One Strike Policy shall also be reflected in the terms and conditions of the Lease. DHC will enforce this One Strike Policy with zero tolerance for drug-related and/or other criminal activity. The entire household may be evicted if there is a violation of this policy. The following activities shall be grounds for termination of the Lease and eviction through the judicial process:

- a. The Resident's failure to ensure that no household member of guest engages in:
 - i. Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other Residents or threatens the health, safety or right to peaceful enjoyment of their residences by persons residing in the immediate vicinity of the development; or
 - ii. Any drug-related criminal activity on or off DHC premises.

- b. The Resident's failure to ensure that no person under the Resident's control:
 - i. Engages in any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other Residents' or
 - ii. Engages in any drug-related criminal activity on the premises.
- c. The Resident's failure to ensure that no member of the household engages in a pattern of illegal use of drugs or a pattern of alcohol abuse that affects the health, safety, or right to peaceful enjoyment of DHC premises by other Residents or DHC employees.
- d. DHC discovers that any member of the household has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.

Since eviction is a civil, not a criminal matter, and a criminal conviction or arrest is not necessary in order to evict a household, DHC must only produce evidence sufficient to justify good cause for the eviction.

DHC's Grievance Policy does not apply to any activity which falls under this policy.

PEST CONTROL POLICY

The Detroit Housing Commission (“DHC”) and its Residents must exert best efforts to ensure a clean and healthy living environment throughout all DHC developments. These efforts must include effective pest control of roaches, other insects, mice and other vermin. The following policies and practices are intended to mutually achieve effective pest control throughout DHC developments.

A. General Cleanliness

DHC will exert best effort to ensure that the grounds, common areas and community facilities are clean and free of any garbage or debris that would attract or provide a food source for insects or vermin. Areas in and around garbage dumpsters and litter containers and community facilities in which food is served will be give special attention.

Residents must exert best efforts to keep individual units clean and free of any garbage or debris that would attract or provide a food source for insects or vermin. Residents are also urged to report any knowledge of site conditions that would attract pests or of actual infestation of roaches, other insects, mice and other vermin. Residents are also encouraged to urge their neighbors to assist in keeping site grounds, common areas and public facilities as clean as possible by placing litter and non-housing garbage in proper containers.

B. Monthly Extermination

DHC will conduct monthly extermination of all units, common areas, basements and building exteriors. The extermination will be done by a DHC employee or contractor that is licensed by the State to perform the extermination work. Regular extermination schedules will be established by Site Managers.

Residents must either be home or make arrangements to have someone else at their home during the scheduled extermination will be done by a DHC employee or contractor that is licensed by the State to perform the extermination work. Regular extermination schedules will be established by Site Managers.

Residents must either be home or make arrangements to have someone else at their home during the scheduled extermination times and must clear out areas which need special extermination treatment, such as kitchen and bathroom cabinets. If a Resident cannot comply with this requirement, the Resident must make special arrangements with the Site Manager, in advance of their scheduled

extermination, to ensure timely extermination. Within reasonable staffing and cost limitations, DHC will try to accommodate special circumstances.

C. Special Exterminations

DHC will periodically conduct extensive exterminations to better control persistent infestation problems and vulnerable areas, and to respond to special emergent circumstances, such as nearby construction which tends to drive mice and vermin from existing burrows into nearby properties. These special treatments will be conducted by either licensed DHC staff and/or contractors.

Residents are urged to inform the Site Manager of particular problem areas and of changed conditions that may require special pest control treatment.

D. Condition Evaluation

DHC will include pest control observations during all unit inspections, during the completion of work orders as well as conduct periodic Resident surveys to find out if Residents believe its policies and practices are effective.

Residents are urged to inform unit inspectors and other DHC staff of any infestation problems and to report to DHC Resident surveys.

E. Enforcement

DHC has included compliance with this policy as part of the Lease in order to ensure a healthy living environment. Violations of this policy will result in Notices to Cease and, if they persist, appropriate remedial action in court.

F. Technical Elements and Assistance

DHC will periodically review and update its pest control policy and training practices.

DHC will use alternating methods of insect extermination, for example, chemical spraying, and “combat”, in order to offset insects’ formidable capacity for adaptability and immunity to extermination substances. DHC will

ensure that extermination chemicals are approved by State standards and, if safety warnings are required, that Residents are fully aware of these precautions.

CRIME TRACKING POLICY

The Detroit Housing Commission (“DHC”) encourages its Residents to assist in tracking and reporting crime by notifying the Site Manager of all calls made to the police.

DHC will cooperate with local law enforcement officials and local courts, implement screening processes and Resident eviction procedures, and meet goals under any HUD-funded drug prevention or crime reduction program. DHC will review its progress in these areas regularly through the compilation of periodic reports, generated at Lease semi-annually, with a fiscal year-end summary completed and submitted to DHC Board of Commissioners.

DHC will work cooperatively with State and local police departments. DHC will request that police: 1) promptly provide the Director of Asset Management with relevant incident report for timely eviction processing; 2) help DHC expedite drug identification in serious cases; and 3) prepare for cases as needed with DHC’s attorney. Police may also be present at eviction hearings involving criminal activity.

DHC will work cooperatively with local judges. Although DHC cannot communicate with judges concerning pending court actions, DHC can communicate with the court system regarding the need for evictions where the evidence shows serious Lease violations and the goal of DHC to provide drug and criminal free housing.

INCIDENTAL PROFIT MAKING ACTIVITIES POLICY

A. General Requirements

With the consent of the Detroit Housing Commission (“DHC”) a Resident may use his/her dwelling unit for legal incidental profit making activities under the following conditions:

1. The unit shall remain the Resident’s primary residence.
2. Business activities and the sales of items are to be conducted from the units. Erection of sheds, tables and/or stalls on the grounds is prohibited.
3. Business activities that increase noise and traffic or interfere with the health, safety and peaceful enjoyment of other Residents will not be allowed.
4. The manufacture, use, sale, distribution and possession of illegal drugs and other criminal activities are prohibited.
5. Residents found engaging in business activities without appropriate licensing and/or prior approval from DHC are in violation of the Lease and may be subject to eviction.
6. Residents are responsible for the removal and disposal of any trash, garbage and debris in and around their unit and must provide the appropriate receptacle in and around their unit to avoid littering of the grounds.
7. DHC will inspect and monitor all business activities at least every six (6) months and businesses cited more than twice annually for non-compliance with this policy with this policy will result in suspension and possible Lease termination.
8. An inspection will be conducted before approval of a request for operation of business in from a DHC unit.
9. Residents who have obtained DHC approval to operate a business will be required annually during re-certification to present a business license and a certified copy of a tax return to verify the amount of income reported to the Internal Revenue Service.

10. Any revenues from approved incidental profit making activities will be calculated as Resident income.

DHC is not responsible for any injuries to persons or damages to property resulting from Resident business activities regardless of whether such activities are approved by DHC.

B. Permissible Activities

The following business activities that do not require any physical alterations to a unit or place undue burden on DHC's resources will be allowed with approval from DHC:

- Babysitting;
- Home distribution – such as Avon, Mary Kay, Amway, Mason Shoes, Tupperware or similar products;
- Haircutting and hair braiding (not requiring use of water);
- Dressmaking/tailoring;
- Educational tutoring; or
- Other business activities with approval.

C. Prohibited Activities

DHC will neither approve nor allow the following business activities to be conducted from the unit:

- The raising and breeding of animals;
- The accumulation of parts, repair of automobiles, motorcycles, boats or appliances;
- Commercial hairdressing;
- Sale of fresh provisions (fruit, vegetables, etc.)
- Commercial food preparation;
- Manufacture and sale of firearms and ammunition;
- Commercial laundry;
- Any business activity that presents a fire hazard; or
- Manufacture and sale of alcohol.

POLICY FOR REMOVAL OF DECEDENT AND DECEDENT'S PERSONAL PROPERTY

A. Procedure when resident is deceased

The Detroit Housing Commission ("DHC") shall treat the death of a Resident with dignity and respect in the removal of the remains while complying with applicable laws, statutes and ordinances.

In the event of a sudden or unexpected death on DHC premises, when a physician is not present, DHC staff will contact the Detroit Police Department ("DPD") and the emergency contact or next of kin listed in the Resident's file. After investigation, the DPD will contact the Wayne County Medical Examiner who will make the determination whether or not the remains shall be taken to the Wayne County Morgue or released to a licensed funeral home. When a physician is present at the death of a DHC Resident, the physician will determine whether to contact the Wayne County Medical Examiner or a licensed funeral home for removal of the remains.

B. Procedure in anticipation of death

If death at home is anticipated and the patient is under hospice care when the death occurs, either those persons present or DHC staff shall contact hospice, which may facilitate the procedures listed above.

C. Handling of potentially hazardous bio materials.

Blood or other potentially infectious material associated with the death of a Resident shall be reported immediately to DHC staff. DHC shall be responsible for removing such material from vacant units or common areas of the building.

D. Procedure used upon death with no remaining occupants.

Michigan law requires that when the death of a residential occupant leaving no other listed members of the household on the lease or rental agreement occurs that several steps are to happen before disposing of the unit's contents without obtaining an order of eviction from the court. DHC's procedure incorporates those requirements and places additional procedures in moving the former resident's property from the unit and removing the decedent out of the DHC system.

1. The Lessee/Resident will be given the option to provide contact information for an authorized person to be notified in the event of the lessee's death. At the point of lease-up and annual recertification, DHC will offer the resident, in writing, the opportunity to identify a person who will be permitted, under the supervision of the site management staff, to remove items for burial. Those items are 1 set of undergarments, 1 pair of shoes, 1 outfit which may include head dressings such as wigs, or hats and any insurance information. The

notification will include that any other items to be removed will require that the interested party obtain an order from the Wayne County Probate Court. DHC is not responsible if contact information is not provided or is incorrect.

2. Upon notification of the death, DHC will change the locks on the unit and notify the emergency contact person by phone and written communication. Thereafter, access to the unit will be restricted to persons with legal authority from the Wayne County Probate Court to enter the unit and/or remove property.
3. If current rent is not paid and DHC believes the person has been deceased for at least 18 days, then, if DHC takes the following steps, it may retake possession of the premises.
 - a. If DHC knows that the person is deceased, staff will immediately notify the next of kin and or designated emergency contact person of the resident's death and that a probate estate should be open within 28 days of the resident's death.
 - b. At the same time, a notice will be sent to a public administrator (PA) regarding the resident's death and the intent of DHC to enter and retake possession of the unit. DHC will also notify the PA that an attempt was made to contact the family or the emergency contact person. The notice will state that either there is no emergency contact person or the emergency contact person has been notified of DHC's intent to retake possession of the property and discard the contents in the unit, if a probate estate is not opened within the 28 day period. The list of the PAs serving Wayne County will be posted on the j:drive. If the PA requests entry, upon presentation of proper credentials and identification, the site manager will grant the PA access to the premises.
 - c. Upon the expiration of 18 days, a 10-day notice that DHC intends to take possession of and/or dispose of the contents upon expiration of the notice will be posted on the door of the affected unit.
 - d. After 28 days, the property manager will confer with the Law Department to determine whether an estate has been opened. If the estate has not been opened, DHC may retake possession of the unit and, in its discretion, dispose of the contents within the unit. If an estate has been opened, a letter will be sent to the personal

representative or the PA advising that the contents within the unit will be disposed of if not removed within the next 10 business days.

E. Remaining household members.

If there are surviving members of the deceased Resident's household, DHC must be contacted within fourteen (14) calendar days of the Resident's death for recertification based on change in family composition. Only family members already on the lease may remain in the unit, all others will be evicted.

BANNING/CRIMINAL TRESPASS POLICY

The Detroit Housing Commission (“DHC”) goal is to provide for the safe and peaceful enjoyment of DHC’s properties for all Residents, their guests and DHC employees.

The Lease signed by each Resident makes the Resident responsible for the conduct of the Resident’s guest. While visitors are welcome, they are expected to act in an appropriate and lawful manner at all times. They are expected to limit their visits to the Resident’s unit and yard. Engaging in criminal activity or unreasonably disturbing any Resident of public housing will not be tolerated.

In keeping with this policy, it sometimes becomes necessary and prudent to bar or ban persons from the property to prevent the disruption of a safe, lawful and peaceful environment. Persons banned under this policy shall be prohibited from entering upon any DHC property for any reason. If a person banned under this policy enters DHC properties during the ban period, it shall be a violation of Michigan criminal trespass laws.

A. Authority to Ban

The Operations Manager is the only DHC employee authorized to ban persons from DHC property. However, all DHC employees have the authority and the obligation to initiate a ban of persons whose conduct on the property causes a threat to the safety or operation of DHC properties or creates a disruption to the maintenance of a lawful, peaceful or safe environment at any DHC property. A DHC employee may initiate a ban of such person and direct the person to leave the property. The employee shall promptly inform the Site Manager of the action, the name of the person(s) sought to be banned, the person’s address, if known, and other identifying information. A DHC representative may recommend to the Operations Manager that a person be banned.

Behavior that violates any DHC Lease or administrative policies may result in a person being banned from DHC property.

B. Duration of Ban

Persons banned from DHC properties shall not come on DHC properties during the ban period. The ban period will be for a length of time specified at the time the ban is initiated or in the ban notice. The ban period may vary depending on the seriousness of the offense or infraction. The following are examples of ban periods that may be imposed for illegal activity on DHC property.

1. Any person that causes a disturbance that requires police intervention may be banned for up to two (2) years.
2. Any person convicted of a felony on the property may be banned for up to five (5) years.
3. Any person convicted of the possession, sale, or distribution of controlled substances on the property may be banned from the property for up to five (5) years.
4. Any person that endangers the health and welfare of the Residents or DHC staff may be banned for up to two (2) years.
5. Any person who harms or attempts to harm an employee of DHC through assault or violence may be banned for up to five (5) years.

C. Criminal Trespass

1. When possible, a notice of the ban shall be served on the individual by DHC's Eviction and Security Specialist, law enforcement, and/or DHC staff. If an address for the person banned is known, the Site Manager will send a notice by first class mail informing the individual the reason for the ban, the ban period, and the procedure by which the person may seek to have the ban removed. Additionally, the Site Manager will send a copy of the ban notice to resident(s) that have past or current known association with the person being banned. However, the efforts of DHC to provide written notice shall to invalidate an oral notice, which shall have the same force and effect as a written notice.
2. The Operations Manager and Property Managers will maintain a list of all persons banned from DHC property. It shall be reviewed annually to determine whether an individual no longer constitutes a threat to the Residents or DHC employee staff. Any individual whose ban period has expired or who is no longer

considered a threat shall be removed from the

ban list and a notification of such removal will be mailed to the person's last known address.

3. Residents who allow banned persons to visit shall be subject to termination of their Lease.
4. Any person banned from DHC properties is forbidden to trespass upon any properties owned by DHC. Any person banned from DHC properties is permitted to visit DHC's Main Administrative Office for the purposes of submitting an appeal or meeting with DHC staff. If such person is found to be or seen on DHC property, all DHC employees are directed and obligated to call law enforcement to have the trespassing person arrested. DHC may pursue prosecution of such individuals.

D. Appeal

One (1) appeal of a banning of an individual may be made to the Executive Director or designee. A banned person who wishes to be removed from the ban list must submit a written request to the Operations Manager. The written request must include the reason for the request and any justification or extenuating circumstances requested for consideration. Proof of rehabilitation is required for any removal of a ban that originated from the use of drugs. The request to appeal the ban must be submitted to the Operations Manager within fourteen (14) calendar days of the effective date of the beginning of the ban period.

The Executive Director or designee will contact the person submitting the appeal to confirm that the appeal is being reviewed. The contact should be made within thirty (30) calendar days, unless the Executive Director or designee is unavailable during that period. The Executive Director or designee will advise the person whether additional information or a meeting is needed to evaluate the appeal. The Executive Director or designee may schedule a meeting with the banned person and other interested or involved parties, e.g., law enforcement officials or DHC Residents. After receiving all information requested and holding a meeting, if necessary, the Executive Director or designee will issue the requester a written decision which sets forth the reasons for the decision.

A Resident may use DHC grievance procedures to appeal the banning of a Resident's guest or any Lease violation issued for the Resident's failure to control his/her guest.

Nothing in this Banning/Criminal Trespass Policy shall abrogate any rights which Residents or DHC may have under law or under the Lease.

ABANDONMENT POLICY

A. Abandonment of Unit

1. Families must notify DHC if they are going to be absent from the unit for more than fourteen (14) calendar days. A person with a disability may request an extension of time as a reasonable accommodation.

If the entire Family is absent from the unit, for more than sixteen (16) calendar days beyond the fourteen (14) calendar days approved by DHC or if the entire Family is absent from the unit for more than thirty (30) calendar days without notice to DHC, the unit will be considered to be abandoned and DHC will terminate the Lease.

“Absent” means that no Family member is residing in the unit.

In order to determine if the Family is absent from the unit, DHC may:

- Conduct a home visit;
- Write letters to the Family at the unit;
- Post letters on the exterior door;
- Telephone the Family at the unit;
- Interview neighbors;
- Verify if utilities are in service;
- Check with Post Office for a forwarding address; and/or
- Contact the Resident’s emergency contact.

B. Disposal of Abandoned Property

Any possessions left in a Resident’s abandoned unit will be removed and stored for thirty (30) days at the expense of the Resident. The possessions shall not be disposed of until DHC has given the Resident a thirty (30) day written notice that his/her possessions will be disposed of at the end of the thirty (30) day period if the Resident does not pay DHC all outstanding rents and other charges and all reasonable packing, moving, and storage fees and remove the possessions within the thirty (30) days period.

Pet removal will be pursuant to the Pet Policy.

POLICY OF INSTALLATION OF SATELLITE DISHES/ANTENNAS

To comply with the Federal Telecommunications Act of 1996 (“Act”), the Detroit Housing Commission (“DHC”) has established this policy regarding the installation and maintenance of satellite dishes/antennas.

Nothing in this policy is to be interpreted as being in contravention of the Act regarding the installation, maintenance, and use of satellite dishes/antennas. Should any portion of this policy be interpreted as contravening the Act, that section(s) shall be considered immediately modified to conform to the Act. Should it be impossible to so modify the section(s) the section(s) shall be deemed severable from the remainder of the policy, and shall be of no force and affect.

A. Definitions

Common elements – all portions of a multi-family building other than the unit and the limited common element(s) assigned to each unit. Common elements include, but are not limited to, open grassy areas, roofs and exterior walls (including interior walls between the unit and the unit’s patio or balcony).

Exclusive use area – limited common element in which the Resident has exclusive use. Limited common elements include, but are not limited to, the patio or balcony adjacent to a unit.

Fixed wireless signals – any commercial non-broadcast communications signal transmitted by wireless technology to and/or from a fixed customer location. Examples include signals used to provide telephone service or high-speed internet access at a fixed location. The term “fixed wireless signals” does not include, among other things, AM/FM radio, amateur (“Ham”) radio, Citizens Band (“CB”) radio, and Digital Audio Services (“DARS”) signals.

Mast – structure to which an antenna is attached that raises the antenna height.

Satellite dish/antenna – any device used to receive video programming services, including direct broadcast satellite (“DBS”), multipoint distribution service (“MDS”), and local television broadcast signals (“TVBS”) and any device used to receive or transmit fixed wireless signals (“FWS”). A mast, cabling supports, guide wires, conduits, wiring, fasteners, or other accessories necessary for the proper installation, maintenance, and use of an antenna shall be considered part of the antenna.

Telecommunications signals – signals received or transmitted by DBS, TVBS, MDS, or FWS antennas.

B. Generally

No fee is payable and DHC approval is not required before a satellite dish/satellite dish/antenna may be installed on a Resident's Exclusive Use Area, i.e., inside the unit or on a balcony or patio. However, Resident's shall notify the Site Manager within fourteen (14) calendar days after a satellite dish/antenna has been installed.

Installation must comply with all applicable codes, take aesthetic considerations into account, and minimize the aesthetic and structural impact to the exterior and structure of the Resident's units.

C. Installation Requirements

1. Satellite dish/antenna Size and Type

- a. Satellite dish/antennas shall not exceed one meter (39.37 inches). Larger satellite dish/antennas are prohibited.
- b. All satellite dish/antennas capable of transmitting telecommunication signals, including FWS satellite dish/antennas, must be labeled to provide notice of radio frequency ("RF") safety hazards and reference the applicable FCC-adopted limits on RF exposure. Also, such satellite dish/antennas must be professionally installed.
- c. All satellite dish/antennas not specifically included within the definition of satellite dish/antenna in this policy or otherwise covered by the Act are prohibited. Residents are to direct all questions regarding whether a particular satellite dish/antenna is permitted at the Site Manager.

2. Location

- a. Multi-Family Developments
 - 1) If acceptable quality signals may be received by placing satellite dish/antennas inside a unit without unreasonable delay or unreasonable cost increase, the satellite dish/antenna must be installed within the unit.
 - 2) Subject to the preceding paragraph, satellite

dish/antennas shall be installed solely in the following locations (listed in decreasing order of preference):

- a) Inside the Resident's unit;
 - b) Within the boundaries of the Resident's exclusive use areas such as patios and balconies; or
 - c) With DHC's prior, written approval, on common elements, i.e., the roof, building, etc.
- 3) Except as otherwise permitted in this policy, satellite dish/antennas shall not encroach upon the space of other Residents. For example, a satellite dish/antenna cannot be installed so that it extends out beyond the balcony or patio and into, on, or over common elements.
- 4) Except with prior, written DHC approval, no satellite dish/antenna of any size may be placed or installed on the common elements even if an acceptable quality signal cannot be received from with the Resident's unit or exclusive use area.
- 5) Satellite dish/antennas shall be located in a place shielded from view from outside the development or from other units in the development to the maximum extent possible. However, nothing in this policy requires installation where an acceptable quality signal cannot be received or in such a manner that unreasonably increases the cost of installation.

b. **Scattered Site Homes**

A satellite dish/antenna shall not be installed on a mast that is higher than twelve (12) feet above the roof line without prior, written DHC approval or, if required, a permit from the City.

A satellite dish/antenna may be installed in any location on the property except the front lawn or the roof of the house or of any other building on the property.

D. Installation

1. Multi-Family Developments

- a. All installations shall be completed so they do not materially damage the common elements, limited common elements, or individual units, or in any way

impair the integrity of buildings. The Resident may not drill holes in walls, doors or window frames in

order to install a satellite dish/antenna or run cable from the satellite dish/antenna to a television.

- b. To the extent an acceptable quality signal can be obtained, the following limited common element locations are the preferred locations and installation sites (listed in decreasing order of preference):
 - 1) On the floor of the balcony railings;
 - 2) Within the boundaries of the patio or balcony; or
 - 3) Attached to the balcony railings in such a way that no part of the satellite dish/antenna extends beyond the boundaries of the balcony.

2. Scattered Sites Homes

The installation of the satellite dish/antenna will not damage property in any way, and only one hole less than 1.5 inches in diameter, may be drilled into an exterior wall.

E. Maintenance of Satellite dish/antenna

The Resident shall keep the satellite dish/antenna in good repair and maintenance and not permit it to become unsightly. DHC may remove a satellite dish/antenna which has become unsightly without liability to the Resident.

The Resident agrees to remove and discard the satellite dish/antenna before vacating the property. All damage, other than normal wear and tear, must be repaired and restored. DHC may charge the Resident for the removal of the satellite dish/antenna and restoring the property.

F. Assumption of Liability by Resident

The Resident shall assume all liability for any and all injury or damage to persons or property caused by the satellite dish/antenna. Resident shall hold harmless and indemnify DHC and its directors, officers and employees from any and all loss, claim, damage, injury, judgment, or cost, including attorney's fees and court costs, resulting from or arising out of the Resident's installation, maintenance, or use of the satellite dish/antenna, to the extent the Resident's negligence in installation, maintenance and/or use of the satellite dish/antenna causes or results in the loss, claim, damage, injury, judgment or cost, including attorney's fees and court costs being indemnified.

BLOOD-BORNE DISEASES POLICY

All Residents and employees shall consider ALL blood or other potentially infectious regardless of the perceived status of the source individual. Residents shall advise DHC management of any blood or other potentially infectious attempt to clean such material from the common areas of DHC property; DHC staff is responsible for cleaning such materials from their individual units.

In the event of exposure to blood or other potentially infectious material. Residents should wash their hands and any other potentially contaminated skin area immediately or as soon as possible with soap and water. Any skin or mucous membrane exposure to blood or other potentially infectious material should be followed by washing or flushing as soon as feasible following contact. Residents should not eat, drink, apply cosmetics or lip balm or handle contact lenses in areas where there is a reasonable likelihood of exposure to blood or other potentially infectious material. DHC equipment, which has become contaminated with blood or other potentially infectious materials, shall be decontaminated as necessary by DHC staff to prevent infection of Residents.

LEAD BASED PAINT NOTIFICATION

Section 302 of the Lead Based Paint Poisoning Prevention Act (LBPPA) requires the Detroit Housing Commission (“DHC”) to conduct a random sample of dwellings and common areas in all premises where children live or are expected to live.

A. The Health Hazard

Human beings are exposed to lead from numerous sources, such as paint pigments, automobile and industrial emissions, source and ground water and some forms of solder.

While adults may suffer various ailments due to excessive lead in their blood, the groups most at risk from exposure to lead are fetuses, infants and children under seven (7). Since the fetus is at risk from high blood lead levels in the mother, pregnant women of child-bearing age also must be aware of the hazards of high blood lead levels.

Excessive blood-lead levels can seriously damage a child’s brain and central nervous system. Lead poisoning in children can cause attention span deficits, impaired hearing, reading and learning disabilities, delayed cognitive development, reduced IQ scores, mental retardation, seizures, convulsions, coma and even death. In adults, high blood-lead levels may increase blood pressure and have other effects.

B. The Hazards of Lead Dust

Lead dust is especially hazardous to young children because they play on the floor and engage in a great deal of hand-to-mouth activity.

Lead-contaminated soil poses a hazard because children may play in or near it and dirt tracked into a home can lead to increased lead dust levels in the home.

C. What to Do to Protect Children Against Lead Poisoning

Some DJC properties may contain lead-based paint. Lead is dangerous, especially to children under seven (7) years of age and to pregnant women and their fetuses. Even low levels of lead can slow a child’s normal development and cause learning and behavioral problems. Residents can help protect children against lead poisoning by taking these steps:

- 1. Have children tested for lead poisoning.**
 - a. Children with lead poisoning may have no signs or symptoms. If they complain, it may be about general things such as headaches or stomach aches.

- b. Because there are no signs or symptoms, a child must be tested for lead poisoning on a regular basis. Simple blood tests to detect lead poisoning are available from health departments, medical clinics, and many private doctors.

2. Help children avoid lead in paint and dust.

- a. Keep children away from peeling paint. Notify DHC right away when paint begins to peel.
- b. Wet mop floors and clean windowsills and other surfaces to remove dust that may contain lead, using a cleaner high in phosphates if possible. Do not use a conventional vacuum cleaner, which can spread the very small lead dust around the unit, for cleaning window wells or sills. Other areas where there is a lot of dust should be cleaned with a wet mop and a high phosphate detergent before vacuuming.
- c. Wash children's hands before they eat.
- d. Wash objects that infants and children frequently put in their mouths.

3. Make sure children eat properly.

- a. Make sure children eat at least three (3) meals a day; children's stomachs absorb more lead when they are empty.
- b. Give children foods rich in iron (lean meats, tuna beans, eggs, greens), which help protect the body against lead.
- c. Give children foods rich in calcium (milk, cheese), which help protect the child's bones against lead.
- d. Avoid giving children fatty foods (fried foods, chips), which allow the body to absorb lead faster.

POLICY ESTABLISHING RENTS FOR DHC EMPLOYEES LIVING ON DHC PROPERTY

It is the benefit of the Detroit Housing Commission (“DHC”) to have a Resident employee who qualifies for public housing and lives in a DHC development. The employee’s presence in the project provides a measure of security to the development. They act as a source of information to other Residents and visitors. The Resident employee is readily available in the case of an emergency.

It is understood that the Resident employee is covered by provisions of the Fair Labor Standards Act of 1974 and under such provisions any overtime worked in excess of 40 hours per week must be compensated for at a scale of one and one-half times their regular pay.

The DHC Board of Commissioners shall establish a flat rent for Resident employees.

All Resident employees will be responsible to pay for any excess utilities used above DHC’s established allowances. A Resident employee who experiences a significant increase in income because of promotion or increase in wages will be subject to review of the flat rent for possible increase or removal from the established flat rent. A Resident employee who leaves the employment of DHC will be removed from the flat rent immediately. The Board of Commissioners reserves the right to review this policy at any time and to update the amount of the rent payable with thirty (30) days’ notice to all Resident employees.

UNCOLLECTIBLE RESIDENT ACCOUNTS PAYABLE

The Detroit Housing Commission (“DHC”) will attempt to collect all monies owed for rent, utilities, damages, other than normal wear and tear, and other charges. DHC will make every effort to collect these charges promptly when due. DHC will utilize all available collection methods.

On at least a quarterly basis, the Chief Financial Officer and Operations Manager will determine when accounts are to be considered uncollectible. Accounts which are at least 365 days delinquent shall be considered uncollectible. Once a determination has been made that an account is uncollectible, the Executive Director shall submit a recommendation to the Board of Commissioners that the amounts owed be charged off as collection losses. The recommendation shall include a list of accounts considered uncollectible and the basis for such determination and the efforts taken to attempt collection.

DHC shall prepare and maintain a “List of Vacated Residents Accounts.” The list shall include all accounts of Residents who have moved from any DHC property during a given year and who still owe monies to DHC. Lists shall be maintained and continually up-dated. The list shall include all developments and all accounts for a given year including accounts charged off as uncollectible.

The “List of Vacated Resident Accounts” shall be updated quarterly to add recent move-outs and/or delete the names of Residents or former Residents who have paid all monies owed in full. No family shall be admitted to a DHC property until such time as it has paid DHC all amounts owed.

RESIDENT INITIATIVES POLICY

The Detroit Housing Commission (“DHC”) responds to Resident needs and interests by providing opportunities to build capacity of individuals and families to enable them to become self-sufficient, as well as to participate in the management and operation of DHC through democratically elected and recognized Resident Councils.

DHC will:

1. Serve as advocate and develop partnerships with private sector and government agencies to provide services essential to the improvement of educational, health and financial concerns of its Residents;
2. Provide information and educate Residents on HUD’s and DHC’s Policies and Regulations, governing Residents’ participation and involvement in the mission and operation of public housing through on-gong trainings and workshops;
3. Facilitate establishment of organized Resident Councils comprised of duly elected Resident leaders who shall have an opportunity to provide input to DHC and represent the needs and interests of Residents;
4. Support Residents in their effort to become self-sufficient through opportunities for job training and education as well as facilitate heir fulfillment of the Community Service and Self-Sufficiency Requirement; and
5. Provide a comprehensive service delivery system to assure that Residents receive the required support and the highest quality of service to enable them to reach their highest level of self-worth and productivity

RECORD MANAGEMENT POLICY

A. Purpose

The purpose of this policy is to direct the Detroit housing Commission's ("DHC") handling of all records and documents associated with the operation of DHC and the administration of its programs.

B. General Policy

In accordance with the Privacy Act of 1974, as revised, DHC will maintain only such information on applicants and Residents as is necessary and relevant to the performance of its mandated duties and will to the best of its ability protect the privacy of applicants and Residents.

C. Legal Action

In the event of potential or pending litigation, all applicable documents and records, regardless of disposal dates, will be retained until resolution of the legal action.

D. Backup of Electronic Data

Computer data will be automatically backed up daily on a separate drive in order to avoid loss of important information due to equipment failure.

E. Special Security Measures for EIV Data

HUD has provided specific guidelines for the protection of data retrieved from its online up front income verification system entitled Enterprise Income verification ("EIV").

EIV Resident data will be used only to verify a Resident's eligibility for participation in the Public Housing Program and the Housing Choice Voucher Program and to determine the level of assistance for which Resident is eligible.

Data provided via the EIV will be protected to ensure that information is used only for official purposes and not disclosed in any way that would violate the privacy of the individuals represented in the EIV system.

F. Applicant and Resident Records

All applicants' and Residents' files will be stored in a secure location that is only accessible by authorized staff. All records shall be maintained in accordance with this policy. Current records will be kept in the office files. Out-dated and obsolete records will be destroyed in accordance with a disposal schedule to be

prepared by DHC.

All resident files will be maintained by unit, including all copies of correspondence with Resident. Resident files will be transferred to storage one (1) year after a unit is vacated and disposed of five (5) years after audit. DHC will maintain a list of all records it destroys.

G. Criminal Records

DHC will keep as confidential all criminal records of drug treatment or sex offender status that are received. These records will be used only to screen applicants for housing or to pursue evictions. The records will not be disclosed to any person or other entity except for official use in the application process or in court proceedings. No copies will be made of the records except as required for official or court proceedings.

Criminal records or records of drug treatment or registered sex offender status will be kept in a file separate from other application or eviction information. These files will be maintained in a different cabinet that is locked and kept in a secured location. Only specified employees shall have access to this cabinet. The records shall be destroyed once action is taken on the application for housing or any grievance hearing or court proceeding has been completed and the action is finalized. DHC will maintain a list of all records it destroys.

All files must be signed for when removed from the secured file storage area.

The DHC employee who signs for a Resident file is responsible for its security. Files are never to be taken home, left unattended or placed in common areas.

SOCIAL SECURITY NUMBER CONFIDENTIALITY POLICY

A. General Policy

As it relates to the social security numbers of its Residents, DHC will:

- A. Maintain the confidentiality of the social security numbers that it receives and maintains in the ordinary course of business.
- B. Limit the internal use to those functions where the use of the social security number is the only reliable method available to ensure the correct Resident has been identified.
- C. Limit access, whether in hard copy or electronic format, to those persons within DHC who have a need to access that information.
- D. Properly dispose of documents which contain social security numbers to ensure their confidentiality.
- E. Prohibit the unlawful disclosure of social security numbers by its employees.

B. Definitions

The following words and/or phrases shall have the following meaning for purposes of this policy:

- A. "Mailed" means delivered by United States mail or other delivery service that does not require the signature of recipient indicating actual receipt.
- B. "Publicly display" means to exhibit, hold up, post, or make visible or set out for open view, including, but not limited to, open view on a desk, computer device, computer network, website, or other electronic medium or device, to members of the public or in a public manner.
- C. "Title IV-D Agency" means the agency in this state performing child support and parenting time enforcement functions including an office of the friend of the court or a prosecuting attorney and it includes a person performing those functions under contract with the Title IV-D agency.

C. Prohibited Activities

Neither DHC, nor an employee on behalf of DHC, shall intentionally do any of the following with the social security number of a Resident:

- A. Publicly display all or more than 4 sequential digits of the social security number.
- B. Visibly print all or more than 4 sequential digits of the social security number on any identification badge, card, membership card.
- C. Require a Resident to use or transmit all or more than 4 sequential digits of his/her social security number over the Internet or a computer

system or network unless the connection is secure or the transmission is encrypted.

D. Require a Resident to use or transmit all or more than 4 sequential digits of his/her social security number to gain access to an inter website or a computer system or network unless the connection is secure, the transmission is encrypted, or password or other unique personal identification number or other authentication device is also required to gain access to the Internet or computer system or network.

E. Include all or more than 4 sequential digits of the social security number in or on any document or information mailed or otherwise sent to a Resident if it is visible on or, without manipulation, from outside of the envelope or packaging.

F. Include all or more than 4 sequential digits of the social security number in any document or information mailed to a Resident, unless any of the following apply:

- 1) State of federal law, rule, regulation, or court order or rule authorizes, permits, or requires that a social security number appear in the document.
- 2) The document is sent as part of an application or enrollment process initiated by the Resident.
- 3) The document is sent to establish or confirm the status of a Resident's eligibility for public housing or to confirm the status of a Resident's social security number.
- 4) The document or information is mailed by or at the request of a Resident whose social security number appears in the document or information.

D. Allowed Activities

Use of all or more than 4 sequential digits of a Resident's social security number is permissible under the following circumstances:

A. A use of all or more than 4 sequential digits of a social security number that is authorized or required by state or federal statute, rule, or regulation, by court order or rule, or pursuant to legal discovery or process.

B. Providing all or more than 4 sequential digits of a social security number to a Title IV-D Agency, law enforcement agency, court, or prosecutor as part of a criminal investigation or prosecution.

C. An administrative use in the ordinary course of DHC business, to do any of the following:

- 1) Verify a Resident's identity or for similar administrative purposes related to determining program compliance.
- 2) Investigate a Resident's claim, credit, or criminal history.
- 3) Detect, prevent, or deter identity theft or another crime.
- 4) Lawfully pursue or enforce DHC's rights under the ACOP.

5) Use as a primary account number provided the use began before the effective date of this policy and the use is on-going, continuous and in the ordinary course of business.

E. Disposition of Documentation Containing Social Security Numbers

All documents and/or electronic media containing Resident social security numbers shall be disposed of only by shredding or burning as appropriate for the nature of the media. No documents and/or electronic media containing social security numbers shall be disposed of in any other manner.

F. Penalties for Violation of Policy

Employees who violate this policy may be subject to discipline up to and including discharge.

HOMEOWNERSHIP POLICY

The Detroit Housing Commission (“DHC”) provides homeownership assistance for low-income families through two (2) program opportunities:

1. Section 32 Homeownership Program, and
2. HOPE VI Homeownership Programs.

A. Section 32 Program

Pursuant to the Section 32 Program, Scattered Sites houses, i.e. properties that are not located within a DHC development, are made available for purchase to qualified low-income Residents. Each house may be sold for 70% of its appraised value by extending special DHC financing in the form of a second mortgage. DHC has designated a preference list for qualified buyers which categorize applicants as follows:

- 1) Current Scattered Site Residents;
- 2) Public Housing Residents;
- 3) Housing Choice Voucher customers;
- 4) DHC waiting list customers;
- 5) City of Detroit Low-Income residents; and
- 6) Regional Low-Income residents.

DHC’s long-term goal is to sell or dispose of all Scattered Site properties from the DHC inventory.

B. HOPE VI Program

DHC will provide special financing for the purchase of a predetermined number of affordable Woodbridge Estates units. The financing shall consist of a DHC second mortgage, not to exceed \$75,000, to qualified buyers. DHC has established a preference list of qualified buyers in the following order:

- 1) Relocated Jeffries Homes Residents;
- 2) Jeffries Homes Impact Area residents;
- 3) DHC Residents;
- 4) DHC public housing and Housing Choice Voucher waiting lists customers;
- 5) City of Detroit residents with less than 100% AMI; and
- 6) All other qualified buyers.

DESIGNATED HOUSING POLICY

The Detroit Housing Commission (“DHC”) submitted its Designated Housing Plan (“Plan”) to the United States Department of Housing and Urban Development (“HUD”) pursuant to authorization by Section 7 of the U.S. Housing Act of 1937 (42 U.S. C. 1437e) and the requirements of HUD PIH Notice 97-12 on 12/16/2004.

DHC reviewed and conducted an analysis of information pertaining to its existing Resident population, its waiting lists and city-wide housing needs to determine the appropriate course of action. DHC determines that it was necessary and desirable to designate certain housing developments for occupancy by elderly families only.

On July 3, 2012 HUD approved DHC’s Plan. The Plan designated the following developments and units for elderly families only:

Developments	Total Units
Forest Park	97
Warren West	143
Woodbridge Senior Village	296
Riverbend Towers	95
Sheridan I	209
Sheridan II	200
Totals	1,040

HOPE VI POLICY

The HOPE VI Program serves a vital role in HUD's and the Detroit Housing Commission's ("DHC") efforts to transform public housing.

The HOPE VI Program, originally known as the Urban Revitalization Demonstration (URD), was developed as a result of recommendations by the National Commission on Severely Distressed Public Housing, which was charged with proposing a National Action Plan to eradicate severely distressed public housing.

The specific elements of public housing transformation that are key to HOPE VI include:

- Changing the physical shape of public housing;
- Establishing positive incentives for resident self-sufficiency and comprehensive services that empower residents;
- Lessening concentrations of poverty by placing public housing in non-poverty neighborhoods and promoting mixed-income communities; and
- Forging partnerships with other agencies, local governments, non-profit organizations, and private businesses to leverage support and resources.

DHC has three (3) HOPE VI Projects:

- The Villages at Parkside (formerly Parkside Homes) on Conner Avenue
- Woodbridge Estates (formerly Jeffries Homes) on John C. Lodge Freeway
- Gardenview Estates (formerly Herman Gardens) on Joy Road

Once all of the HOPE VI Projects are completed, DHC will have 1,048 new public housing units in these HOPE VI Projects.

As a part of its HOPE VI Projects, DHC has allocated funds to assist all Residents who originally lived at the development, whether or not they return to the site after revitalization, as well as needy families that later move into the revitalized site. DHC will utilize these funds to implement a case management approach to providing services and assessing the needs of individual families. In doing so, DHC will solidify relationships with key organizations that offer services leading to self-sufficiency of each participant. Services may include, but are not limited to, the following areas:

1. Job Training
2. Educational enhancement
3. Life Skills Training

4. Home Ownership Training
5. Child care
6. Transportation
7. Youth and Senior services

MAINTENANCE POLICY

The Detroit Housing Commission (“DHC”) is responsible for the maintenance of its properties to provide safe, decent and sanitary housing for its Residents. To ensure its ability to fulfill this responsibility, DHC has established a priority system to address work orders. The priority of response to work orders is:

1. Emergency work orders – within 24 hours of receipt
2. Resident initiated non-emergency work orders – within 14 days of receipt

DHC will establish a comprehensive Maintenance Plan to address routine and preventative maintenance as well as to provide guidance to its employees regarding performing DHC’s maintenance responsibilities.

EMERGENCY PREPAREDNESS POLICY

As a responsible landlord, the Detroit Housing Commission (“DHC”) is committed to ensuring its ability to provide required services to its Residents in the event of an emergency. To that end, DHC will develop and implement an Emergency Preparedness Plan to address how it will operate in the event of natural or manmade emergencies.