



EAH HOUSING

Greenfield Commons I

229 Hayes Circle, Marina, CA

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OVERVIEW

Greenfield Commons is a 200-unit development on a 10.97-acre parcel at 41206 Walnut Avenue in Greenfield, CA. The development will provide permanently affordable year-round rental housing to local families employed in the agriculture sector. The proposed development is consistent with the City of Greenfield’s Housing Element and with EAH’s goal of creating a community by developing, managing, and promoting quality affordable housing. Phase I construction includes 100 residential units, laundry, community building, Walnut Avenue’s street improvements, stormwater catchment features, and parking. Phase II construction includes 100 residential units, laundry, maintenance, and parking. A portion of the stormwater drainage basin located in Phase II will be constructed in Phase I.

Greenfield Commons I is an Equal-Opportunity Housing Facility, admitting people according to local, state, and federal Fair Housing laws and by the California Department of Housing and Community Development (HCD), the City of Greenfield, and the County of Monterey (HACM)

Joe Serna Units (FWHG):

Greenfield Commons Phase I consists of 100 units, of which 43 are designated to be occupied by farmworkers; those units are identified as “FWHG Assisted Units.” Farmworkers who currently reside or have resided within the past 36 months at an Office of Migrant Services (OMS) migrant center shall be given priority admission to vacant farmworker-restricted units funded by the FWHG Program, by Assembly Bill 2024 (Chapter 523, Statutes of 2024), signed into Law by the Governor on September 24,

2024, and integrated into the Health and Safety Code (HSC) Section 50718(b) effective January 1, 2025.

The Office of Migrant Service (OMS) in the jurisdiction of Greenfield Commons is King City, located at 440 Jayne Street, King City, County of Monterey (831) 385-3482. The Migrant Center Operator is the Housing Authority of the County of Monterey (HACM).

Summary of Unit Designations:

Bedroom Size	Area Median Income/Program	Number of Units
One	60% AMI	16
One	70% AMI	16
Two	30% AMI / PBV	17
Two	60% AMI	16
Two	70% AMI	10
Two	Staff Unit	1
Three	30% AMI / PBV	10
Three	30% AMI	1
Three	60% AMI	8
Three	70% AMI	5

SERNA Units (FWHG)

Bedroom Size	Area Median Income/Program	Number of Units
Two	30% AMI / PBV	17
Two	70% AMI	10
Three	30% AMI / PBV	10
Three	30% AMI	1
Three	70% AMI	5

The application process varies depending on the two categories:

General Affordable Units: In screening and selecting applicants for units at Greenfield Commons I, there shall be no discrimination based on race, religion, age, national origin, disability, familial status, gender, sexual preference, or any other arbitrary factor. All applicants are asked for the same information and treated similarly. The applicant screening and selection process is conducted strictly with the letter and spirit of all federal and state fair housing statutes. The Resident Manager will regularly receive in-service training and counseling regarding Fair Housing requirements.

All units are leased to qualified applicants based on the appropriate size in relation to the number of family members. Units shall be leased using names from a pre-established waitlist based on the lottery and preference order. The Housing Authority of the County of Monterey designated project-based Section 8 voucher units will be excluded from the lottery process.

If the initial demand for units at Greenfield Commons I at lease-up exceeds the number

of available units, applicants will be placed on the waitlist and processed by unit size available, lottery number, and preference order.

Applicants will be placed chronologically after the pre-established lottery ranking order when the waitlist re-opens.

The Housing Authority of the County of Monterey (HACM) Project Based Voucher (PBV) Units: Twenty-seven (27) units are to be reserved for extremely low-income households that meet the 30% area median income (AMI) rent and income requirements of the City of Greenfield, the County of Monterey, and the California Department of Housing and Community Development. Those units with Project-based Section 8 vouchers available from HACM will be leased to qualifying households. All twenty-seven (27) of these units will be assisted by Project Based Vouchers.

The units will be set aside (restricted) to eligible households referred by the Housing Authority of the County of Monterey. Residents who are approved for a restricted unit will receive project-based assistance and pay a percentage of their adjusted income towards rent as calculated by the Housing Authority of the County of Monterey.

The Housing Authority of the County of Monterey will administer the waitlist for the 25 restricted units at the initial lease-up and thereafter. Greenfield Commons I will maintain a waitlist for the 27 restricted units as a backup if HACM’s waitlist is depleted and the Housing Authority does not refer eligible households. Once HACM re-opens its waitlist and has sufficient applicants to refer to Greenfield Commons I, only referred applicants will qualify for the HACM-designated project-based Section 8 units.

In addition to meeting the requirements of this Resident Selection Plan (RSP), applicants for restricted units will also need to meet the requirements for the project-based voucher program and attend a Section 8 briefing set forth by the Housing Authority of the County of Monterey.

The Housing Authority of the County of Monterey and Greenfield Commons I will conduct a separate screening process. Each selected applicant for the restricted units must return a completed and signed application and participate in the initial certification process to determine move-in eligibility.

REASONABLE ACCOMMODATION

Individuals with a disability have the right to ask for and receive reasonable accommodation and to request auxiliary aids. Management staff operates and administers the property to enable persons with disabilities (physical and/or mental) to have equal access to participate in the program. Greenfield Commons I will ensure effective communications with applicants, residents, and the public to ensure that policies regarding how the property is operated do not adversely affect applicants, residents, and the public.

In determining whether to deny admission because of family members' action or failure to act, management will consider mitigating circumstances relating to a family member's disability and the effects of denial or termination of assistance with other family members who were not involved in the action or failure to act. If the family includes a person with a disability, management's decision concerning termination or denial is subject to consideration of reasonable accommodation by 24 CFR Part 8.

When a family member requires an accessible feature(s), policy modification, or other reasonable accommodation to accommodate a disability, Greenfield Commons I will provide and pay for the requested accommodation unless doing so would result in a fundamental alteration like the program or an undue financial and administrative burden.

A reasonable accommodation is a change, exception, or adjustment to a program, service, building, or dwelling unit that will allow a qualified person with a disability to:

- Participate fully in a program.
- Take advantage of a service.
- Live in a dwelling.

To show that the requested accommodation may be necessary, there must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability.

The requirement to provide reasonable accommodation is always present throughout a person with disabilities' tenancy, including during lease enforcement. Reasonable Accommodation Request forms are available upon request from management but are not required to make a reasonable accommodation request.

The person named below has been designated to coordinate compliance with the non-discrimination requirements of the Department of Housing and Urban Development's regulations implementing Section 504 (24 CFR, part 8, dated June 2, 1988).

**18801 Ventura Blvd., Ste 300
Tarzana, California 91356
Richard.Kennemer@EAHHousing.org
(213) 468-8261 / TDD (800) 735-2929.**

You may contact the TTY line for those with hearing impairment by calling the California Relay Service at 711.

In addition, you may request assistance with:

1. Explaining and filling out the application form.
2. Supportive documents are needed to complete your application.
3. Help with the appeal process.
4. Help with a reasonable accommodation.

NON-SMOKING POLICY

Greenfield Commons I is designated a non-smoking property. Smoking is prohibited in all areas of the property, including the interiors of apartments and all indoor and outdoor common areas.

It is the resident's responsibility to inform their guests of the Non-Smoking Policy. Any violation of the Non-Smoking Policy will be deemed a material breach of the Rental Agreement and grounds for immediate termination of the Lease/Rental Agreement.

Greenfield Commons I's adoption of a Non-Smoking Policy does not make the owner the guarantor of the residents' health or ensure that the property will be smoke-free. Still, management shall take reasonable steps to enforce this policy.

PRIVACY POLICY

Greenfield Commons I's policy is to guard the privacy of individuals conferred by the Federal Privacy Act of 1974 and ensure the protection of such individuals' records maintained by management.

Therefore, neither Greenfield Commons I

nor its agents shall disclose any personal information in its records to any person or agency unless the individual about whom information is requested shall give written consent to such disclosure.

This privacy policy does not limit management's ability to collect information needed to determine eligibility, compute rent, or determine an applicant's suitability for tenancy.

Consistent with the intent of Section 504 of the Rehabilitation Act of 1973, any information obtained on disability will be treated confidentially.

INCOME LIMITS

To qualify for a unit, the gross income of the household must not exceed the maximum income limit per household size. To meet program requirements, people cannot pay more than the rent limits, less the utility allowance established for the project. Income minimums do not apply to applicants with tenant-based vouchers.

The income limits are designed to be consistent with the requirements of the financing programs and regulatory agreements governing the property.

All applicants must meet specific underwriting guidelines. This project is subject to the requirements of several funding sources. The attached information reflects these requirements to the best of management's knowledge but is subject to change if required for compliance with law, regulations, or policy changes.

The income maximums are attached and will be posted in the Greenfield Commons I Office.

APPLICATION ACCEPTANCE

Greenfield Commons I property management staff will proactively inform prospective applicants of the application acceptance opening.

Prospective tenants may call the management office at (831) 621-1256 to inquire about the application process for housing at Greenfield Commons I. The outgoing message will be available in English, Spanish, Chinese, Vietnamese, Mandarin, and Tagalog. Language Line Solutions services are available to Greenfield Commons I to assist with interpretation for speakers with limited and non-English proficiency.

Greenfield Commons I will announce the opening of the application acceptance period on the EAH Housing website: EAHHousing.org/Greenfield-Commons-1.

Please do not contact the City of Greenfield or the County of Monterey for assistance. If you require assistance obtaining and applying or clarification regarding the application process, please call (831) 621-1256.

The announcement (flyer) will include the application acceptance period and anticipated occupancy date, information regarding all accessible services, activities, and facilities offered on-site, methods for obtaining and accepting applications, income/rent/occupancy limits, as well as the following statements:

“This housing is offered without regard to race, color, religion, sex, gender, gender identity and expression, familial status, national origin, citizenship status, immigrant status, primary language, marital status, ancestry, age, sexual orientation, disability,

source of income (including receipt of Section 8 and other similar vouchers), genetic information, military or veteran status, arbitrary characteristics, or any other basis currently or subsequently prohibited by law. Individuals with a disability have the right to ask for and receive reasonable accommodations and to request auxiliary aids.”

Flyers will be distributed electronically to local community organizations listed in the marketing plan.

Obtaining Applications

Applications will be available for applicants to complete online via the EAH Housing website at EAHHousing.org. Online applications are strongly encouraged.

Prospective applicants may download a copy of the application, complete and return to:

Greenfield Commons I (Temp Office) Or call (831) 621-1256 and request a copy to be mailed to you.

Submitting Applications

Submissions of applications for the 34 general affordable units will be accepted on the EAH Housing website at EAHHousing.org. **Or return a completed, signed copy to:**

Greenfield Commons I (Temp Office)
220 Twelfth Street Greenfield, CA 93927

Reasonable accommodation will be made for individuals with disabilities throughout this process, including methods for obtaining and submitting applications.

For units designed as accessible for persons with mobility, visual, or hearing impairments,

MOVE-IN APPLICATION

households containing at least one person with such impairment will have priority.

Applicants at the top of the waitlist will receive a letter with instructions on completing the online move-in application. Greenfield Commons I management staff is available to assist with completing hard copy and online applications.

Online applications are strongly encouraged. If you choose to complete a hard copy move-in application, entries are to be made in ink or typed. Corrections or changes must be made by lining through the original entry and entering the correct data. Such changes must be dated and initialed by the person making the change.

The application must be completed and signed by the head of household and all household members 18 years of age and older before an applicant can be placed on the waitlist. If an application is not entirely answered, the date it is fully completed will be the date it is accepted for rental purposes. Applicants with a pending application will be encouraged to complete the application within 3 days. Management will assist with the application process. Apartments are offered on a first-qualified, first-offered basis. If the application remains incomplete after the 3 days of receiving a reminder notification, the move-in application will be closed. The applicant will return to the wait list or be removed if offered a second opportunity for housing.

Application Processing Steps

Applicant households at the top of the waitlist for each designated unit type will:

1. You can complete the full application online or attend an in-person interview with a management staff member and complete a hard copy of the entire application. Online certifications are strongly recommended.
2. Submit proof of preference from one of the listed sections above if you claimed a preference on the application.
3. Each applicant must complete an application and be willing to submit a credit history, criminal background inquiry, and income and asset verifications. An Employment Verification fee of \$9.95 will be charged to each adult applicant whose employment income can only be verified by a third party via The Work Number.

This fee applies only to applicants for the 39 general affordable units. Applicants who fail to pay the employment verification fee for the work number service will be denied because they failed to cooperate with the certification process.

Greenfield Commons I management staff will complete the eligibility verification (e.g., verify income, conduct background checks, etc.). During the interview, Copies of current picture ID and social security card will be made, or you may upload these documents if you complete the process online.

Preferences

Greenfield Commons I has state preferences, as required by financing sources. These preferences will determine the order in which applicants are processed for the units. Every applicant must meet the property's Resident Selection Plan (RSP) standards for acceptance as a resident.

Prospective applicants may claim their

preference on the application. Proof of preference will be provided by the local Office of Migrant Services (OMS), which in this case is in King City and operated by the Housing Authority of the County of Monterey.

If a preference is claimed and you are contacted to continue processing your application, you must submit proof of preference when we contact you for an interview. If you cannot provide the necessary preference documentation, your application will be determined as non-preference.

For units designed as accessible for persons with mobility, visual, or hearing impairments, households containing at least one person with such impairment will have priority.

State Preferences Requirements

The State of California Department of Housing and Urban Development (HCD), through the Farm Workers Housing Grant Program, provides preference to farm workers who are currently living and/or have lived within the last 36 months in any of the state's OMS, with the priority focused on the OMS of King City.

Apartment Offer

Greenfield Commons I management staff will inform the applicant of denial or approval in writing. Applicants will be notified of their eligibility for residency, and the approximate date when a unit may be available will be provided.

Applicants will be offered only one apartment. All offers will be confirmed in writing. Apartments are provided on a first-qualified, first-offered basis. If an applicant cannot accept an apartment during the building's initial lease-up within three (3) days of the offer, the applicant will remain on the waitlist.

Applicants who do not accept the second offer of a unit will be removed from the waitlist.

Prompt written notification will be sent to applicants found ineligible to occupy a unit of their ineligibility, the reason for the ineligibility, and their right to appeal this determination.

A reasonable accommodation request will be considered at the applicant's/household's request. In addition, with the applicant's/household's approval, the referring case manager will be allowed to appeal any application denial based on information obtained from criminal record checks. However, all applicants will have to demonstrate that they meet program requirements.

APPLICATION PROCEDURES

Section 8 Project-Based Vouchers (PBV)

Twenty-seven (27) units will be set aside (restricted) to eligible FWHG households referred to by The Housing Authority of the County of Monterey. Residents approved for a restricted unit will receive project-based assistance and pay a percentage of their adjusted income towards rent as calculated by The Housing Authority of the County of Monterey. The Housing Authority of the County of Monterey will administer the waitlist for the 27 restricted units at the initial lease-up and thereafter. If HACM's waitlist is depleted and the Housing Authority does not refer eligible households, HACM may re-open the wait list for the project-based section 8 units. Once HACM re-opens its waitlist and has sufficient applicants on the waitlist to refer to Greenfield Commons I, only referred applicants will qualify for the HACM-

designated project-based Section 8 units.

In addition to meeting the requirements of this RSP, applicants for restricted units will also need to meet the requirements for the project-based voucher program and attend a Section 8 briefing set forth by the Housing Authority of the County of Monterey.

The Housing Authority of the County of Monterey and Greenfield Commons I will conduct a separate screening process. Each selected applicant for the restricted units must return a completed and signed application and participate in the initial certification process to determine move-in eligibility.

Selection of Qualified Applicants

Greenfield Commons I will collaborate to match the referred applicant's household characteristics with the available unit type in selecting a household to occupy a particular unit. Matching households to units according to household size, household characteristics, and number of bedrooms is acceptable and necessary to comply with occupancy standards and local codes.

Household characteristics include, but are not limited to, the number of household members, accessibility needs, and income level. Units must be assigned according to referral date/time, household size, and household composition to maximize unit utilization. Occupancy standards are in place to prevent the over-or-underutilization of units. Greenfield Commons I will first offer units with special accessibility features to households with persons with disabilities requiring such features.

VERIFICATION (ALL CATEGORIES)

Applicant interviews will be completed through the property management online portal or held in person to obtain signed verification forms for all income and asset information. During the interview, applicants will complete a Tenant Income Certification Questionnaire listing income, asset sources, and amounts. All adult household members may be asked to sign forms sent out to a 3rd party to verify information provided on the application (e.g., income and asset information) before any offer to rent a unit.

All applicants must comply with and cooperate with third-party verification requirements. The applicant is responsible for providing the information, enabling management to complete and receive the necessary verification in a reasonable time.

All income and assets will be verified via third-party confirmation, i.e., a verification form completed by the employer, a verification form completed by a financial institution, etc. In addition to the third-party verification, applicants must submit specific second-party verification documentation, such as three (3) months consecutive pay stubs, current bank statements, etc.

Applicants who meet the eligibility criteria detailed in the Resident Selection Plan (RSP) will receive an approval and offer letter. The letter will include a scheduled appointment date and time to sign the completed Tenant Income Certification (TIC) and a rental lease agreement. Move-in costs will also be included.

Employment Verification

The Work Number: At the initial move-in for

a tax credit unit, HCD policy requires that all tenant files contain 3rd party verification for all wage earners in the form of a Verification of Employment (VOE) along with three months of recent consecutive paystubs. HCD requires a Verification of Employment (VOE) for all initial applicants, including wage earners, which can only be verified via the Work Number.

During Annual Recertification, we are no longer required to supply a VOE from the Work Number as long as 3 months of recent consecutive paystubs are included in the file.

Income calculations are based on the household's annual gross (anticipated) income for the 12 months following the anticipated move-in date. Gross yearly income also includes income from all assets.

Upon initial occupancy, the tenant's income cannot exceed the area median income limit for household size as published annually by the U.S. Department of Housing and Urban Development (HUD) and California Tax Credit Allocation Committee (TCAC).

Households that still need to meet the eligibility requirement of the Resident Selection Plan will receive a letter of denial for housing. Applicants who receive a denial letter have the right to appeal the decision. All other applicants will remain on the list until a unit is available and the household reaches the top. For exceptions, please also refer to the section regarding the periodic Purging of the Waitlist.

Each applicant must complete an application and be willing to submit a credit history, criminal background inquiry, and income and asset verifications. A copy of the applicant's credit report will be sent to applicants who request a copy.

UNIT TRANSFER POLICY

A Unit Transfer List is maintained for those residents who have been approved for transfer. Assignments of apartments will alternate between residents on the unit transfer list and applicants from the waitlist. With the exception that transfers for medical reasons will take priority over transfers for changes in household size. Accessible units will be offered first to those who need these features.

OCCUPANCY STANDARDS

Occupancy standards are the criteria for matching a household with the most appropriate size and apartment type. **HCD's occupancy guidelines will be followed to avoid under, or over-utilization of the units as follows:**

Bedroom	Household Minimum	Household Maximum
1	1	3
2	2	5
3	4	7

To determine the proper bedroom size for which a household may qualify, the following household members are to be included:

- All full-time members of the household
- Live-in attendants
- Foster children
- Unborn children
- Children in the process of adoption

Management will annually recertify household size for all units. If at the time of recertification, a resident's household size has

changed and no longer meets the occupancy standards under HCD's occupancy standards, management may require the resident's household to move to the next available appropriately sized unit.

Households that no longer meet the occupancy standards for the unit will be placed on an in-house transfer list and moved to the next available appropriately sized unit in chronological order.

VIOLENCE AGAINST WOMEN ACT

The Violence Against Women Act protects victims against eviction or denial of housing based on domestic violence, dating violence, sexual assault, and stalking. 2013, Congress expanded housing protections by covering additional federal housing programs. **The Act offers the following protections:**

1. An applicant's or program participant's status as a victim of domestic violence, dating violence, sexual assault, and stalking is not a basis for denial of admission if the applicant otherwise qualifies for admission.
2. This must support or assist victims of domestic violence, dating violence, sexual assault, and stalking. It must protect victims, as well as members of their families, from being denied housing or from losing their HUD-assisted housing.
3. An incident or incidents of actual or threatened domestic violence, dating violence, sexual assault, and stalking will not be construed as serious or repeated violations of the lease or other "good cause" for terminating the assistance, tenancy, or occupancy rights of a victim of abuse.
4. Criminal activity directly related to

domestic violence, dating violence, sexual assault, and stalking, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, shall not be cause for termination of assistance, tenancy, or occupancy rights of the victim of the criminal acts.

5. Assistance may be terminated or a lease "bifurcated" to remove an offending household member from the home. Whether or not the individual is a signatory to the lease and a lawful tenant, if they engage in a criminal act of physical violence against family members or others, he/she stands to be evicted, removed, or have his/her occupancy rights terminated. This action allows the victim, a tenant or a lawful occupant, to remain.
6. The provisions protecting victims of domestic violence, dating violence, sexual assault, and stalking engaged in by a member of the household may not be construed to limit Greenfield Commons I, when notified, from honoring various court orders issued to either protect the victim or address the distribution of property in case a family breaks up.
7. The authority to evict or terminate assistance is not limited to a victim who commits unrelated criminal activity. Furthermore, if Greenfield Commons I can show an actual and imminent threat to other tenants or those employed at or providing service to the property if an unlawful tenant's residency is not terminated, then evicting a victim is an option, the VAWA notwithstanding. Greenfield Commons I will not subject victims to more demanding standards than other tenants.

The VAWA protections shall not supersede any provision of any federal, state, or local law that provides more excellent protection for

victims of domestic violence, dating violence, sexual assault, and stalking. The laws offering greater protection are applied in instances of domestic violence, dating violence, sexual assault, and stalking.

The Notice of Occupancy Rights and Certification form will be provided to applicants when assistance is denied or at the time of move-in.

Nonretaliation

The owner will not discriminate against anyone who has opposed any act or practice made unlawful by the Violence Against Women Act or who testified, assisted, or participated in any matter related to the Violence Against Women Act or a VAWA crime.

Noncoercion

The owner shall not coerce, intimidate, threaten, interfere with, or retaliate against any person in the exercise or enjoyment of, on account of the person having exercised or enjoyed, or on account of the person having aided or encouraged any other person in the exercise or enjoyment of, any rights or protections under the Violence Against Women Act including:

1. Intimidating or threatening any person because that person is assisting or encouraging a person entitled to claim the rights or protections under the VAWA.
2. Retaliating against any person because that person has participated in any investigation or action to enforce the Violence Against Women Act.

Protection to Report Crimes from Home

Owner, residents, occupants, service providers, guests, and applicants:

1. Shall have the right to seek law enforcement or emergency assistance on their behalf or behalf of another person in need of help.
2. They shall not be penalized based on their requests for assistance or criminal activity of which they are a victim or otherwise not at fault under statutes, ordinances, regulations, or policies adopted or enforced by covered governmental entities.

Prohibited penalties include:

- a. Actual or threatened assessment of monetary or criminal penalties, fines, or fees.
- b. Actual or threatened eviction.
- c. Actual or threatened refusal to rent or renew tenancy.
- d. Actual or threatened refusal to issue occupancy permit or landlord permit.
- e. Actual or threatened closure of the property, or designation of the property as a nuisance or a similarly negative designation.

Termination of Tenancy or Assistance

The VAWA allows owners to deny, evict, or terminate assistance for violations unrelated to domestic violence, dating violence, sexual assault, or stalking.

The owner will not subject the resident/applicant, who is a survivor of domestic violence, dating violence, sexual assault, or stalking, or is affiliated with an individual who is a survivor of domestic violence, dating violence, sexual assault, or stalking, to a more

demanding standard than other resident/applicants in determining whether to evict or terminate assistance.

The VAWA does not limit an owner's authority to deny, terminate assistance to, or evict a resident or applicant under a covered housing program when the owner can demonstrate an actual and imminent threat (to other resident/applicants or those employed at or providing service to property of the covered housing provider) would be present if that resident/applicant or lawful occupant is not evicted/terminated. In this context, words, gestures, actions, or other indicators will be considered an "actual and imminent threat" if they meet the standards provided in the definition of "actual and imminent threat."

Determinations about the presence of imminent danger will not be based on stereotypes. Instead, they will be tailored to individual residents' concerns.

The owner will take into account individual circumstances when deciding to terminate the tenancy; such circumstances might include, among other things, the seriousness of the offending action, the extent of participation by the leaseholder in the offending action, and whether the leaseholder, if not the wrongdoer, took all feasible steps to prevent the offending action from occurring and has removed the offending person from the lease or otherwise banned the offending person from the premises in the future.

Any eviction or termination of assistance will be initiated only when no other actions can be taken to reduce or eliminate the threat. **Examples of such action include, but are not limited to:**

- Transferring the survivor to a different unit when doing so would reduce or

eliminate the threat. Also see Addendum A for information about VAWA emergency transfers.

- Barring the perpetrator from the property.
- Contacting law enforcement to increase police presence.
- Develop other plans to keep the property safe.
- Seeking other legal remedies to prevent the perpetrator from acting on a threat.

Lease Addendum

The HUD approves the lease addendum, which will be implemented and provided per HUD guidance.

VAWA Emergency Transfers

The owner is concerned about the safety of residents and applicants, and such concern extends to residents and applicants who are survivors of domestic violence, dating violence, sexual assault, or stalking, which are collectively referred to as VAWA crimes. The owner has developed a VAWA Emergency Transfer (VET) Plan that allows survivors of VAWA crimes or people associated with survivors of VAWA crimes to request a VET. Please refer to the property's VAWA and VET policies for more detailed information.

Internal VAWA Emergency Transfer refers to an emergency relocation of a resident to another unit where the resident would not be categorized as a new applicant (usually referred to as a unit transfer); that is, the resident may reside in the new unit without having to undergo an application process. If a unit is available, the resident must be eligible for the unit based on the requirements set forth by the governing agency. The resident should discuss unit transfer eligibility requirements with the owner and/or property

staff to understand the requirements fully.

When a resident qualifies for an internal VAWA Emergency Transfer, and when no unit is immediately available (vacant and ready for occupancy), the owner will add the resident to the property's waitlist with a preference. The resident may remain on the property waitlist even if the resident decides to pursue an External VAWA Emergency Transfer.

External VAWA Emergency Transfer refers to an emergency relocation of a resident to another unit where the resident would be categorized as a new applicant; that is, the resident must undergo, apply, and be eligible to reside in the new unit. The applicant may be required to meet the eligibility requirements and/or screening requirements set forth by the agencies governing the housing program and the property's owner.

Safe unit refers to a unit that the survivor of domestic violence, dating violence, sexual assault, or stalking believes is safe.

GROUNDS FOR DENIAL

- Total family income exceeds the applicable income limits published by HUD or does not meet the minimum income limit. (not applicable for subsidized units or voucher holders)
- Households cannot pay the full security deposit at move-in.
- The household refuses to accept the second offer of an apartment.
- Households fail to respond to interview letters or cooperate with the certification process, including failing to sign consent forms.
- ANY adult household member fails to attend an eligibility interview.
- Blatant disrespect or disruptive behavior toward management, the property, or

other residents exhibited by an applicant or family member at any time before move-in.

- The applicant has failed to provide adequate income verification, or we cannot adequately verify income and/or income sources.
- Providing or submitting false or untrue information on your application or failing to cooperate with the verification process.

The unit assignment will NOT be the family's sole place of residency. Qualification for a unit includes occupying it continuously and as a primary residence. Residents may not be absent from the unit for more than 60 consecutive days or longer than 180 continuous days for medical reasons.

CREDIT CHECK

Credit checks will not be performed for tenant-based voucher holders.

The owner will not conduct credit screenings for applicants of government-subsidized housing, such as project-based Section 8 or tenant-based Section 8 voucher holders.

For applicants who are not applying for project-based Section 8 units or who are recipients of a tenant-based voucher, the owner/agent reviews each adult applicant's credit history for the last three years.

When reviewing credit history, the owner does not consider medical bills/expenses.

When reviewing credit history, the owner does not consider student loans and/or expenses.

Bankruptcy: The owner will reject any

applicant family that includes a member with a discharged bankruptcy (Chapter 7 or Chapter 13) within the last three years. The owner will consider the applicant if the bankruptcy was dismissed and other credit information is "positive."

Foreclosure: The owner will reject any applicant that includes a family member named in foreclosure, including foreclosure of reverse mortgages, within the last three years.

Collections: The owner will reject any applicant family that includes a member currently paying or being pursued to pay any collectible amount above \$2500 when such collections began within the preceding three years. If the applicant is paying amounts due and such collections started more than three years before the eligibility determination, the collection status must be current (no outstanding balances more than ninety (90) days old). The owner will use a screening company to assist with credit screening.

Records to be reviewed include, but are not limited to:

- Civil Judgement
- Child Support
- Federal Tax Lien
- State Tax Lien
- Forcible Detainer
- Garnishment
- Utility Lien (Power, Water, Sewer, Gas)

Credit history will be reviewed to determine if there is any debt owed to a prior landlord or HUD. **Any applicant family that includes a member owing prior landlords or HUD will be rejected unless:**

- Such debt has been paid.
- The applicant has entered into a repayment agreement and can demonstrate that payments toward the

principal amount(s) have been on time for six months.

Other credit history will be reviewed. **The following discoveries will be the reason for the rejection of the applicant's family:**

- Any applicant has one or more outstanding judgments over \$1000 within the last three years.
- Any applicant has a record of two or more checks returned for insufficient funds in the last year.
- Any applicant has a current credit score below 350.
- Any applicant has defaulted on any loan/payment agreement over \$500 within the last three years.
- Any applicant has a record of failure to pay child support owed within the last 12 months.
- Any applicant has received an overpayment of federal assistance due to misrepresentation and/or fraud within the last three years.

The credit screening will be considered "positive if an applicant has no credit history."

BACKGROUND CHECK

The lookback period for criminal felony convictions is three years. If your criminal record or poor rental history was due to a disability, you are encouraged to submit a Request for Reasonable Accommodation along with this application.

For the general affordable units, the lookback period for criminal felony convictions is three years. **The following will be used as a basis for denial:**

- Serious felony convictions involving murder, manslaughter, arson, rape,

kidnapping, child sex crimes in the past three years.

- b. Threatening or violent engagement acts or behavior against management staff, agents, or residents on the premises.
- c. Destruction or vandalism of the dwelling units or premises.

Criminal Screening

Screening is performed reasonably, consistently, and compliant with fair housing laws. It helps ensure that households admitted to a property abide by the lease terms, pay rent on time, take care of the property and unit, and allow all residents to enjoy their homes peacefully.

This includes, but is not limited to, live-in aides, security/police officers, or additional household members wishing to move in after the initial move-in. Certain exceptions apply to children and minors. The current screening guidelines for when the new household member applies will be used to determine eligibility for admission.

HUD has established standards that prohibit the admission of:

- 1. Any applicant family in which any member was evicted in the last three years from federally assisted housing for drug-related criminal activity.
- 2. An applicant family in which any member is currently engaged in the illegal use of drugs or for which the owner has reasonable cause to believe that a member's illegal use or pattern of unlawful use of a drug may interfere with the health, safety, and right to peaceful enjoyment of the property by other residents. (The owner has implemented a policy to address the term "currently engaged." Current will be indicated and

investigated if there is a record of arrest or conviction within the last two years).

- 3. Any applicant family member, if there is reasonable cause to believe that member's behavior, from abuse or pattern of abuse of alcohol, may interfere with the health, safety, and right to peaceful enjoyment by other residents. The screening standards are based on behavior, not the condition of alcoholism or alcohol abuse.
- 4. Any applicant family that includes a household member who is subject to any state lifetime sex offender registration requirement.

In addition to HUD requirements, the owner has established a policy to reject all applicant families when any member of the applicant family has engaged in criminal activity, as described in this document.

The owner will reject Pre-Applications or Applications if any household member's criminal history includes one or more of the following:

- 1. Criminal activities resulting in felony conviction involving violence, potential violence, destruction of property, human trafficking, terrorist activities, weapons charges, or the illegal distribution or manufacture of an illicit or controlled substance. Applicant families that include members with this type of criminal history will be automatically denied. The owner will meet with the applicant and the applicant's family and consider extenuating circumstances if the conviction or exit from incarceration (whichever is later) occurred no less than seven years before the date of Pre-Application or Application and when no additional criminal activity is indicated.
- 2. Criminal activities resulting in other

felony convictions if the conviction or exit from incarceration occurred no less than seven years before the date of Pre-Application or Application. The owner will consider extenuating circumstances when no additional criminal activity is indicated.

- 3. A record of three or more separate instances where the applicant is involved in criminal activities resulting in a felony conviction.
- 4. Criminal activities resulting in misdemeanor convictions involving violence, potential violence, destruction of property, human trafficking, terrorist activities, weapons charges, or the illegal distribution or manufacture of a controlled substance within five years of conviction or exit from incarceration, whichever is later. The owner will meet with the applicant and the applicant's family and consider extenuating circumstances if the conviction or exit from incarceration (whichever is later) occurred no less than three years before the date of Pre-Application or Application and when no additional criminal activity is indicated.
- 5. Criminal activities result in other misdemeanor convictions within three years of conviction or exit from incarceration, whichever is later. When no additional criminal activity is indicated, the owner/agent will consider extenuating circumstances.
- 6. A record of three or more separate instances where the applicant is involved in criminal activities resulting in misdemeanor convictions where the last conviction or exit from incarceration is within five years. Any member of the applicant's family is currently subject to registration under a state sex offender registration program. If the owner determines that a registered sex

offender is part of the applicant's family, they will allow the applicant's family to remove the sex offender from the Pre-Application or Application. Removal must be documented using a signed, notarized copy of the owner's form. The applicant's family will have ten business days to verify that the household member has alternative housing or that the household member has applied for alternative housing. Failure to provide such documentation will result in the rejection of the applicant's family. In this case, the owner reserves the right to monitor household composition after move-in. Suppose the owner discovers that a sex offender has moved into the unit. Assistance will be terminated, and the household will be evicted following HUD requirements. Any assistance paid in error must be returned to HUD.

If the owner cannot complete the required criminal or sexual offender screening because the applicant failed to provide the necessary information or release forms, the applicant's family will be rejected.

If a resident or applicant has requested VAWA protections and such protections have been justified based on owner investigation, the alleged abuser/perpetrator will not be approved to live on the property.

Based on HUD recommendations, the owner will review the criminal history of all adult household members at each location.

Consideration of Extenuating Circumstances

In deciding whether to exercise discretion to admit an individual or applicant family that has engaged in prohibited criminal activity, the owner will, upon request, consider all of

the circumstances relevant to the particular admission or eviction decision, including but not limited to the seriousness of the offending action; the effect that denial of the entire applicant family would have on family members not involved in the criminal activity; and the extent to which the applicant has taken all reasonable steps to prevent or mitigate the criminal activity.

Additionally, when explicitly considering whether to deny admission for illegal drug use by a household member who is no longer engaged in such activity, the owner will, upon request, consider whether the household member is participating in or has completed a drug rehabilitation program, or has otherwise been rehabilitated successfully.

GRIEVANCE/APPEAL PROCESS

Failure to meet one or more screening criteria may be grounds for denial. However, each application is considered a whole, and the above factors are considered part of a weighted formula. If the applicants fail to meet the screening criteria, they will receive a written notice indicating they have the right to appeal the decision. This notice must indicate that the applicant has 14 days to dispute the decision.

An appeal meeting with the Property Supervisor or the Compliance staff will be held within ten business days of receipt of the applicant's request.

Within five days of the appeal meeting, the property will advise the applicant in writing of the final decision regarding eligibility. Apartments will not be held for those applicants in the appeal process.

WAITLIST PROCESS

The property is required to maintain a waitlist of all eligible applicants. Applicants must be placed on the waitlist and selected from it even in situations where there are vacancies, and the application is processed upon receipt. This procedure is necessary to ensure the complete and accurate processing of all documentation for all applicants. The property has one waitlist established and maintained in lottery ranking order, then based on the date and time of receipt of the Application when the waitlist is reopened.

The waitlist contains the following information for each applicant:

- Applicant Name
- Address and/or Contact Information
- Phone Number(s)
- Unit Type/Size
- Household Composition
- Preference/Accessibility requirements
- Preference/City and County
- Income level
- Date/Time of Application (re-open)

Applicants must report changes in writing to any of the information immediately. Applicants will have the opportunity to decline the first apartment offered and retain their place on the waitlist. If they decline the offer of the next available unit, they will be removed from the waitlist.

Purging the Waitlist

The waitlist will be purged annually. Each applicant will receive a letter from the property requesting updated information and asking about their continued interest. This letter must be returned within the specified time, or their application will be removed

from the Waitlist. The applicant is responsible for maintaining a current address with the office to receive waitlist correspondence. Undeliverable mail will result in removal from the waitlist.

Opening & Closing Waitlist

Our marketing plan contains the advertising methods used to announce the opening and closing of the waitlist.

RESIDENT SELECTION PLAN

The Resident Selection Plan (RSP) shall be posted in a conspicuous and public area. Changes to the Plan will be sent via U.S. mail to all persons on the active waitlist. When the waitlist opens, the Resident Selection Plan will be distributed with applications and available at management's request.

RECERTIFICATION REQUIREMENTS

All residents must recertify annually. Proposed changes in household composition and student status must be reported to management immediately.

The resident's family composition, income, and expenses are reviewed annually.

Adding a new resident must be approved before the new member moves into the unit. Failure to notify the owner/agent before a new member is added is a material lease violation and may result in termination of tenancy.

Verification

The owner shall obtain verifications in compliance with requirements set forth by the Department of Housing and Urban Development. After the preliminary eligibility

determination, no decision to approve a Pre-Application or Application shall be made until the information provided on the Pre-Application or Application form and during subsequent interviews has been collected. Any necessary follow-up interviews have been performed.

All information about the following items must be verified as described in these procedures.

Information to be Verified

Information to be verified includes, but is not limited to:

1. Eligibility for Admission
 - Income
 - Assets and Asset Income
 - Identification
 - Age
 - Household Composition
 - Social Security Numbers
 - Student Status
 - Current HUD Assistance
2. Allowances
 - Age
 - Disability
 - Full-Time Student Status
 - Child Care Expenses
 - Disability Assistance Expenses
 - Medical Expenses (For Elderly/ Disabled Households Only)
3. Preferences
 - Status as a Victim of a Presidentially Declared Disaster
4. Compliance with Resident Screening Guidelines
 - Criminal History
 - Credit History
 - Rental/Residence History
5. The Need for an Accessible Unit

Methods of Verification

Verifications will be attempted as follows:

1. Means-tested verification (also known as Safe Harbor): The owner will not accept Means-tested Verification.
2. Upfront Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system.
3. UIV using non-EIV resources (e.g., Work Number, web-based state benefits system, etc.).
4. Written, third-party verification from the source, also known as "tenant-provided verification." An original or authentic document generated by a third-party source dated within 120 days of the date received by the owner. A statement for the appropriate benefit year is acceptable documentation for fixed-income sources. Owners may also accept third-party verification directly from the verification source. For example, owners may, but are not required to, obtain verification of disability directly from a medical care provider (e.g., physician, physical therapist, etc.) or may accept a letter provided by the provider to the resident.
5. EIV with Self-Certification (Employment or Unemployment Income): The EIV Income Report may verify and calculate income if the family self-certifies that the amount is accurate and represents current income. The family will be provided with the information from EIV.
6. Written Third-party Verification Form.
7. Oral verification: When verifying information over the telephone or via the Internet, it is essential to be sure that the person is the party they claim to be. **When verifying information by phone, the owner must record and include in the tenant's file the following information:**
 - Third-party's name, position, and contact information.
 - Information reported by the third party.

- Name of the person who conducted the telephone/internet interview and
 - Date and time of the call.
8. Family Self-Certification: In the absence of any of the above or as provided in HUD guidance, notarized or witnessed self-certification from the household member (the owner is not required to accept family/self-certification.) Except when accepted based on HUD guidance (e.g., Streamlining, Assets Disposed, etc.), when the owner accepts Family Self-Certification, the tenant file will be documented, when appropriate, to show that staff attempted other acceptable verification before relying on family self-certification.

Sources of Information

Sources of information may include, but are not limited to:

- Any Member of the Applicant Family
- Present And Former Housing Providers/Landlords
- Present And Former Employers
- Banks
- Insurance Companies
- Any Asset Manager
- Family Members
- Any Person or Organization Providing Gifts/Regular Contributions to Any Member
- Social Workers/Parole Officers
- HUD's Enterprise Income Verification System (EIV)
- The Work Number
- Court Records
- Health Providers
- Physicians
- Clergy
- Schools/Institutes of Higher Education
- Department Of Homeland Security
- Department of Health and Human

- Services (HHS)
- The Internal Revenue Service (IRS)
- The Social Security Administration (SSA)
- Medicare/Medicaid
- Representative Of The United States Armed Forces
- Any Federal/Local Benefit Providers
- Pharmacies
- Utility Providers
- The World Wide Web (Internet)

The owner will be the final judge of the credibility of any verification submitted by an applicant. If the owner questions the validity of a document or the validity of the information provided, management staff will review it and rule on its acceptability.

Period for Verification

Except where HUD allows, only verified information less than 120 days old may be used for verification. This does not apply to means-tested verification, which may be used for up to 12 months.

Income from federal programs may be verified using an award letter for the award year until the cost-of-living adjustment (COLA) is announced.

Verified information not subject to change (such as a person's date of birth) will not be re-verified.

Owner Created Verification Forms

The owner may create verification forms for specific verification needs.

Owner-created verification forms must clearly state that the applicant or resident is not required to sign the form if it does not indicate who will provide the requested information and who will receive it. The owner

will retain a copy of the verification form and provide a copy to the applicant or resident upon request.

Streamlining

The owner has implemented the following streamlining processes. The owner will not adopt Streamlined Determination of Fixed Income except for January to April certifications. Once the Social Security Cost-of-Living Adjustment (SS COLA) is announced, it will be applied to any certifications for the award year that were not completed on the announcement date.

Verification of Assets

At move-in and at least every three years, the owner will verify the cash value of not expressly excluded assets and verify the income from those assets when possible. In years two and three, the owner will conduct such verification only if the net cash value of all family assets exceeds the current asset threshold. If the net cash value of all family assets (except those expressly excluded) is equal to or less than the current asset threshold, the owner/ will accept the family's notarized or witnessed self-certification, providing the net cash value of assets not explicitly excluded, and any known income from those assets.

The owner will accept self-certification of assets at move-in if the net cash value is \$50,000 or less, and the resident will provide anticipated income for those assets.

Streamlined Certification for Fixed Income Families

The owner will not implement Streamlined Certification for Fixed Income Families.

UNIT INSPECTION REQUIREMENT

Before signing the lease, Greenfield Commons I and the resident must jointly inspect the unit. The resident has five days to report any additional deficiencies to Greenfield Commons I, which will be noted on the move-in inspection form.

Greenfield Commons I performs annual unit inspections. Agencies providing funding have the right to inspect the unit to ensure the property is physically well-maintained and that the residents are provided with decent, safe, and sanitary housing.

Residents will receive prior written notification for all unit inspections.

When a resident moves out, a final inspection will be completed. Residents are encouraged to attend the move-out inspection. However, if the resident does not wish to participate, Greenfield Commons I management may conduct the inspection alone.

PETS

The Pet-Friendly Housing Act of 2017 (Health and Safety Code, div. 31, pt. 2, Ch 2, Section 50466) requires each housing development be financed on or after January 1, 2018, under Division 31 of the Health and Safety Code, to authorize a resident of the housing development to own or otherwise maintain one or more common household pets within the resident's dwelling unit, subject to applicable state laws and local government ordinances related to public health, animal control, and animal anti-cruelty.

SERVICE or ASSISTANCE animals are not considered pets and are not required to comply with the provisions of the Pet

Policy. Service or Assistance animals are specifically required to assist individuals with documented disabilities. Please notify management if you need a Service or Assistance animal.

EQUAL HOUSING OPPORTUNITY

Greenfield Commons I does not discriminate based on disability status in admission to, access to, treatment, or employment in its federally assisted programs and activities.

EMERGENCY TRANSFERS

Greenfield Commons I is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking.

In accordance with the VAWA, Greenfield Commons I allows residents who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of Greenfield Commons I to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether Silver Oak has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on

a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees Greenfield Commons I's subsidy programs to ensure they are in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L, is eligible for an emergency transfer if:

- The tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit.
- The tenant may transfer if they face imminent harm from violence or if they are a victim of sexual assault that occurred on the premises within the past 90 days.

A tenant requesting an emergency transfer must expressly request the transfer using the procedures described in this plan.

Tenants not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request

To request an emergency transfer, tenants must notify Greenfield Commons I's management office and submit a written request to 229-243 Hayes Circle, Marina, CA 93933. If not previously provided, documentation of domestic violence, dating violence, sexual assault, or stalking must be included. Reasonable accommodations will be provided for individuals with disabilities.

The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under Greenfield Commons I's program.
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

Acceptable documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking must be provided if the tenant has not provided such documentation.

Acceptable documentation includes any one of the following forms of verification:

1. A complete HUD-approved certification Form 5-382.
2. A document:
 - Signed by the resident and an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional, or a mental health professional (collectively, "professional") from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse.
 - That specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and remedies under this subpart and that the incident meets the applicable definition of domestic violence, dating

Internal Emergency Transfer Timing and Availability

Internal emergency transfers refer to an emergency relocation of a resident to another unit where the resident would not be categorized as a new applicant. The resident may reside in the new unit without undergoing an application process. Internal emergency transfers are only available within the community in which the tenant is living.

Greenfield Commons I cannot guarantee that a transfer request will be approved or how long it will take to process it. However, Greenfield Commons I will act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to the availability and safety of the unit. Transfers for these reasons will take priority over all other transfer requests, including those made to accommodate a disability and to address over- or under-utilization of a unit.

If a tenant believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. Greenfield Commons I may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If an internal safe unit is not immediately available, a tenant is allowed to seek an internal and external emergency transfer concurrently.

External Emergency Transfers

External emergency transfers refer to an emergency relocation of a resident to another

unit where the tenant would be categorized as a new applicant. The tenant must apply to reside in the new unit.

3. A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency.
4. At the discretion of Greenfield Commons I, the resident should provide a statement or other evidence.

If Greenfield Commons I receives conflicting evidence of domestic violence, dating violence, sexual assault, or stalking (e.g., certification forms from household members accusing each other), it may request third-party documentation within 30 days to resolve the conflict. Failure to provide this documentation may result in denial of protections under this notice.

Confidentiality

Greenfield Commons I will keep confidential any information that the tenant submits in requesting an emergency transfer and information about the emergency transfer unless the tenant gives Greenfield Commons I written permission to release the information on a time-limited basis or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act for All Tenants for more information about Greenfield Commons I's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

unit where the tenant would be categorized as a new applicant. The tenant must apply to reside in the new unit.

While EAH Housing may manage other communities within the area, each is (1) owned by different entities, which are the actual housing providers at those communities for whom EAH Housing is acting as an agent, (2) has its wait lists, and (3) is subject to its regulatory agreements. As such, except in rare circumstances where the Owner owns another community, EAH Housing must process transfers to other communities, even those managed by Greenfield Commons I, as external transfers. In most circumstances, Greenfield Commons I cannot prioritize such external transfers even if Greenfield Commons I manages the property or EAH Housing manages the property for the other owner. External transfers will require the transferring tenant to go on any pending waitlist in the same position as any other new applicant at the other property.

Additional Assistance

If Greenfield Commons I lacks safe, available units for an eligible tenant in need, it will help the tenant find other housing providers with suitable options.

At the tenant's request, Greenfield Commons I will also assist tenants in contacting the local organizations aiding victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Safety and Security of Tenants

The transfer and the actual transfer are pending processing, and the tenant is urged to take all reasonable precautions to be safe if it is approved and occurs.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at (800) 799-7233 or a local domestic violence shelter for assistance in creating a safety plan. That hotline can be accessed for persons with hearing impairments by calling (800) 787-3224 (TTY).

Tenants affected by sexual assault can call the National Sexual Assault Hotline at (800) 656-HOPE or visit Rainn.org.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at Victimsofcrime.org.