COUNTY OF ORANGE

HEALTH CARE AGENCY
BEHAVIORAL HEALTH SERVICES

DAVID L. RILEY
DIRECTOR

Excellence
Integrity
Service

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March 24, 2010

Notice of Re-Posting for 30-Day Public Review Period for Harper's Pointe Senior Apartments Under the MHSA Housing Program

A 30-day public review and comment period is required for the Orange County Health Care Agency (HCA) to submit an application to the State-administered Mental Health Services Act (MHSA) Housing Program and an additional 30-Day comment and review period is necessary for any substantive revisions to the original posting.

The initial review for Harper's Pointe Senior Apartments ends April 15. The original posting proposed seven (7) one bedroom units at a proposed cost to the MHSA fund of $104,830.00. The requested amount for each unit did not include the inflation adjustment allowed. The revised MHSA dollar amount requested for each unit is $108,160. The increase in requested funding reflects the addition of an inflation adjusted amount of four percent (4%). Comment on the proposed development, as attached, must be received by the County prior to the end of the 30th day from the date posted on this notice to be considered for inclusion in the County's final analysis and certification of the application to the State.

The following sections of the application are attached for consideration, review and comment:

- Section 4.2.1 – Project overview
- Section 4.2.5 (D.1 through D.5) – MHSA Housing Program supportive housing and services information
- Development Summary Form

We appreciate your feedback and encourage you to direct any questions or comments regarding the proposed development to Judy Iturriaga as follows:

Judy Iturriaga, PhD., MFT
Service Chief I
Orange County Health Care Agency
Tel: (714) 834-5048
Mhsahousing@ochca.com

Sincerely,

Mark A. Refowitz
Behavioral Health Director

County of Orange
Health Care Agency, Behavioral Health Services
Mental Health Services Act (MHSA) Office
600 W. Santa Ana Blvd., Suite 510
Santa Ana, CA 92701

Harper's Pointe Senior Apartments Development

30-Day Public Comment Form
March 25, 2010 to April 24, 2010

PERSONAL INFORMATION			
Name			
Agency/Organization			
Phone number		**E-mail**	
Mailing address (street)			
City, State, Zip			

MY ROLE IN THE MENTAL HEALTH SYSTEM			
☐	**Person in recovery**	☐	**Probation**
☐	**Family member**	☐	**Education**
☐	**Service provider**	☐	**Social Services**
☐	**Law enforcement/criminal justice**	☐	**Other (please state)**

COMMENTS

Submit Your Comments to

Judy Iturriaga, PhD., MFT
Service Chief I
Phone: (714) 834-5048
E-mail: mhsahousing@ochca.com
Mail: 405 W. 5th Street, Suite 500
Santa Ana, CA 92701

DEVELOPMENT SUMMARY FORM
MHSA Housing Program

Development Information

County Mental Health Department: Orange County Health Care Agency/Behavioral Health Services

Name of Development: Harper's Pointe Senior Apartments

Site Address: 845 Baker, Costa Mesa, CA

Development Sponsor: USA Properties Fund

Development Developer: USA Properties Fund

Primary Service Provider: OASIS

Type of Development: ☒ New Construction ☐ Acquisition/Rehab

Type of Building:
☒ Apartment ☐ Shared ☐ Condominium ☐ Single ☐ Other_____

Total number of units and bedroom types: 53 one bedroom units

Total number of MHSA units and bedroom type: 7 one bedroom MHSA units

Total Cost of MHSA Units: $1,972,261

Amount of MHSA Funds Requested: $757,120 in Permanent Capital

Requested MHSA funds for Capitalized Operating Subsidies: ☒ **YES** ☐ **NO**

Square footage by bedroom of MHSA units: 550 sq ft

Contact Information:

Judy Iturriaga
Service Chief I
405 W. 5th Street, Suite 500
Santa Ana, CA 92701
714-796-0200
mhsahousing@ochca.com

Orange County
County of Orange Health Care Agency
Mental Health Services Administration

Section 4.2.1 Project Overview

Harper's Pointe Senior Apartments
845 Baker Street, Costa Mesa

USA Properties Fund are currently in the process of developing an affordable mixed use senior community at 845 Baker Street that we believe will be a great benefit to the residents of Costa Mesa. The senior apartments will have ample services that will assist the resident seniors in their daily activities. The community will consist of 53 units within one four story building, as well as a community center which will provide services and activities for all the residents. The community center will include kitchen facilities for gatherings and educational classes. Computers will be available with online access for internet searches and to keep in touch with family members via e-mail and aroom to conduct computer-training classes will also be available. Recreational rooms will be offerred for health screenings, social activities, and arts and crafts among social activities. There will also be onsite laundry rooms that will be located in the residential building. The resident open areas will all be professionally planned and decorated.

All the units are to be one-bedroom units of approximately 550 square feet. Each unit will have a full kitchen with an oven, microwave and refrigerator. All the units will be accessible by elevator and have dedicated parking on the ground level.

The building has a unique sophisticated design that will stimulate mixed use development in the SOBECA district of Costa Mesa. Leveraging the different funding sources will allow us to build a high quality project that will rival any market rate apartment in exceptional design and quality of construction. Our goal is to set the standard for quality of design and construction for future developments in the City of Costa Mesa.

The location is suitable for the senior population as there are many nearby amenities and easy access to public transportation. Within walking distance are a grocery store, pharmacy, medical clinic and library among other shops and restaurants. Within a block are two bus stops with service for two different bus lines allowingresidents the ability to travel to any part of Orange County.

The senior apartments will be developed using multiple funding sources along with Federal Tax Credits constituting the majority of the funds. All of the units are to be affordable by utilizing the tax-credit financing program and will range from 30% to 60% of the Area Median Income (AMI). These below market rents are very much needed by many seniors of Orange County who have trouble meeting their financial obligations each month.

The project is to be funded with Federal Tax Credits, city funds, county funds and funds from the Mental Health Services Act. Seven special needs units are to be allocated to the project for MHSA-enrolled tenants. Those MHSA tenants are to be seniors who were previously homeless or at the risk of homelessness. The rents will be set based on Orange County AMI with the MHSA units tenant-paid portion which are estimated to be approximately $260 a month. The community will be managed by USA Multifamily Management, Inc., a nationally certified management company that has extensive experience with managing affordable senior apartments and working with special need tenants.

The developer, in conjunction with Orange County Health Care Agency Behavioral Health Services has partnered with the Older Adults Support and Intervention System (OASIS) to provide supportive services to the MHSA Housing Program tenants. OASIS is a Full Service Partnership program whose parent company is Providence Corporation. The OASIS program is administered by College Community Services, a subsidiary of Providence Corporation. The OASIS staff will provide services to the MHSA tenants both on and off-site. Services will be delivered under the MHSA philosophy of “Whatever It Takes” and include case management, group and individual counseling, psychiatric services, crisis management, dual diagnosis treatment, and life skills. All OASIS services are offered using the Recovery Model which emphasizes client strengths and client-driven and directed services. The goals of treatment are to improve community integration and independent functioning.

Entitlements from the City of Costa Mesa are to be completed by May 2010 and the project will then be submitted to the Tax Credit Allocation Committee July 2010. If the TCAC application is successful, construction would then begin February 2011. Construction would then be completed within 12 months with a three month lease up period; therefore lease up would be finished May 2012.

Section D1: Consistency with Three Year Program and Expenditure Plan

Orange County Health Care Agency's (HCA) and Behavioral Health Services (BHS) *Fiscal Year 2009-10 Annual Update to the Three Year Program and Expenditure Plan for MHSA Community Services and Support (CSS),* identified a need for permanent supportive housing for Older Adults aged 60 and above with Serious Mental Illness (SMI) who are homeless or at risk of being homeless and are underserved. Additionally, the County's original MHSA *Three Year Program and Expenditure Plan*, prepared following an intensive collaborative effort and input from consumers, family members, community leaders, service providers and other interested parties which included community forums and age-specific surveys, found that the provision of supportive permanent housing for Older Adults, who are homeless or in danger of homelessness, was ranked first among the top six issues identified by community stakeholders for this age group. The Orange County MHSA Housing program is expected to generate approximately 185 Supportive Housing units across all the age categories served. The MHSA Housing program at Harper's Pointe Senior apartments directly responds to this identified community need and County priority by directly serving the Older Adult population with SMI.

<u>Harper's Pointe Senior apartments Responds to Identified Need for Older Adults</u>

USA Properties Fund, Inc. partnering with OASIS as the Older Adult full service provider (FSP) for MHSA specific resident services, is requesting MHSA capital and operating subsidy funding for Harper's Pointe Senior apartments. This development, located at 845 W Baker St. in Costa Mesa, incorporates the seven (7) one bedroom MHSA units into a 53-unit, affordable senior housing project, offering a larger sense of community to MHSA residents. Each unit will have a full kitchen, private bedroom, bathroom and living room allowing the residents privacy and independence. The project is to be 100% affordable for no less than 55 years with the main financing source coming from 9% tax credits.

In addition to onsite amenities such as a community room, open air deck and a ground floor retail space, there are a number of amenities within walking distance to the project, including a bus stop, full scale grocery store, pharmacy, medical clinic and library. Offices for the MHSA full service provider will also be onsite.

Harper's Pointe Senior apartments will provide much needed high quality permanent supportive housing for seniors, 60 years and older with serious mental illness and at risk of homelessness. The seven units will have the benefit of comprehensive onsite services provided by OASIS, as well as general services provided by the management company, USA Multifamily Management, Inc. The OASIS program will focus on attaining and maintaining maximum independence in the community for each of the participants and will utilize an approach based on individualized goals. Senior wellness, both physical health care and mental health treatment, will be stressed.

The seven MHSA units at Harper's Pointe Street apartments will substantially contribute to the County's goal of creating 185 supportive housing units.

Section D2: Description of Target Population to be Served

Harper's Pointe Senior apartments will provide seven (7) units of permanent supportive housing for Older Adults (aged 60+), one of the identified Mental Health Services Act (MHSA) target populations under the Orange County MHSA Housing plan. Older Adults served in the MHSA Housing program at Harper's Pointe Senior Apartments will be age 60 or older with a diagnosis of serious mental illness (SMI) and be homeless or at risk of becoming homeless. They may be unserved or underserved and may have been hospitalized, at risk of institutionalization or been involved in the criminal justice systems. Individuals served may have a co-occurring substance abuse disorder, and may suffer from functional impairments. Older Adults in the program will be of very low income with an annual income not to exceed 30% of Area Median Income (AMI), and many older adults may have incomes considerably less than 30% AMI. At the time of entrance into the housing, it is anticipated that many of the older adults may have no income other than SSI/SSA.

Section D3: Tenant Selection Process

OASIS, USA Properties Fund, Inc. and USA Multifamily Management, Inc. (the identified property management provider) will work together to develop and coordinate respective tenant identification, certification, referral, application, eligibility, notice of eligibility, fair housing, appeal and reasonable accommodations processes. As the MHSA Full Service Provider, OASIS will provide ongoing supports and services to individuals applying for MHSA Housing Program units. OASIS will provide on-site and off-site supportive services to MHSA tenants in order to maximize housing stability and success at self sufficiency.

Property management staff and OASIS will work together to ensure that eligible clients have the information and support they need to complete the application process. OASIS will provide assistance with completing the rental application, gathering supporting documentation, providing a point of contact, preparing for the tenant interview, and general assistance throughout the application process. The tenant selection process described below includes sufficient flexibility to house MHSA households who have historically been unable to obtain or maintain stable housing. Applicants with negative background information will have the opportunity to demonstrate that past behavior causing those issues was related to a disability and request reasonable accommodation. The availability of OASIS' supportive social services that can assist older adults in meeting the conditions of tenancy may also be considered in evaluating such information.

Life Skills Training and Educational Programs, Inc. ("LifeSTEPS") is a California 501(c)3 non-profit public benefit charitable corporation. LifeSTEPS was founded in 1993 by Riverside Charitable Corporation ("RCC") and provides social services to virtually all of USA Properties' affordable housing communities. RCC, USA Properties Fund, Inc., USA Multifamily Management, Inc., and LifeSTEPS, as a team, have developed a successful, widely acknowledged model of social service delivery focusing on case management, educational classes, crisis management, mediation, and social and community participation programs. LifeSTEPS currently serves over one hundred and forty family and senior affordable housing communities in the State of California, representing over thirty-five thousand residents.

LifeSTEPS will provide to the residents of Harper's Pointe Senior apartments an on-site Director of Social Services ("DSS"). The DSS is an educated and trained professional who will provide ethical and effective program development and oversight at the property. After conducting a thorough needs assessment, the DSS will develop and implement programs and activities at the property, as well as providing case management, resource development, crisis intervention, and educational classes. LifeSTEPS' approach is holistic, with a focus on case management and crisis intervention to address individual needs, and a combination of educational classes, mediation services, and social activities geared to addressing community needs. For example, LifeSTEPS has developed a curriculum of three-month classes tailored for seniors, such as computer training, ESL, health and safety, financial management, and leadership training. In addition, LifeSTEPS seeks to develop volunteer and recreational

opportunities for residents, food distribution programs, and eviction prevention funds. LifeSTEPS will also reach out to work with local non-profit and governmental agencies, including of course OASIS, to access and coordinate services for the residents of Harper's Pointe.

Threshold Eligibility Criteria:

MHSA Housing Program Threshold Eligibility:

1. **Applicant has a Serious Mental Illness or Severe Emotional Disorder**
   Applicant is an adult 55 year or old with a verifiable serious and persistent mental illness as defined in Welfare and Institutions Code Section 5600.3 (b)

   Applicant is either "Homeless" OR "At-Risk of Homelessness"

   Homeless:
   "Homeless" means living on the streets, or lacking a fixed, regular, and adequate night-time residence. (This includes shelters, motels and living situations in which the individual has no tenant rights).
   (Source: MHSA Housing Program Term Sheet)

   At Risk of Homelessness:
   At risk of becoming homeless due to one of the following situations:
   (i) Transitional age youth exiting the child welfare or juvenile justice systems
   (ii) Individuals discharged from institutional settings including:
   Hospitals, including acute psychiatric hospitals, psychiatric health facilities (PHF), skilled nursing facilities (SNF) with a certified special treatment program for the mentally disordered (STP), and mental health rehabilitation centers (MHRC)

   Crisis and transitional residential settings
   (iii) Released from local city or county jails
   (iv) Temporarily placed in a residential care facility upon discharge from (ii) or (iii) above
   (v) Certification by the county mental health director as an individual who has been assessed by and is receiving services from the county mental health department and who has been deemed to be at imminent risk of being homeless
   (Source: MHSA Housing Program Term Sheet)

2. **Applicant had difficulty obtaining/maintaining housing**
   In addition to being either homeless or at-risk of homelessness, the certification must demonstrate that the issues and/or conditions that establish the individual's eligibility for the housing program are the same issues and/or conditions that significantly interfere with his/her ability to obtain and maintain housing; and without services linked to the MHSA Housing Program, the individual will not be able to obtain or maintain housing

3. **Eligible for MHSA services**
   Applicant is enrolled in an MHSA FSP program funded and approved by the State as part of the County's Community Services and Support Plan. In Orange County, other factors besides mental illness and homelessness that contribute to MHSA eligibility include:

   - Functional impairments due to an untreated or under-treated mental illness that prevents engagement in meaningful activities and inability to remain in housing.
   - Frequent incarceration or psychiatric hospitalizations due to untreated or under-treated illness.
   - Special consideration is given to the ethnically and culturally unserved/ underserved populations among the homeless and mentally ill, especially in the Latino and Asian/Pacific Islander communities.

   Note that the Property Management of each project will verify applicants' income, along with other eligibility factors, in relation to the funding restrictions on the MHSA Housing Program rental units.

Other Eligibility Criteria:
Tenants for the project may come from any city in Orange County and will be linked to OASIS. OASIS will provide the assessment of the tenants to ensure they meet threshold eligibility—age, disability status (serious mental illness), and status as homeless or at risk of homelessness—as well as assist them in obtaining required documentation to complete the rental application. Additionally, OASIS will work to engage tenants into the program, work to develop relationships and provide each tenant with ongoing support. OASIS will also provide linkage between the tenant and the other agencies involved such as: OC Community Services (the local Housing Authority), USA Multifamily Management, Inc. and Orange County Health Care Agency Behavioral Health Services.

Marketing/Outreach:
The marketing and outreach for the project will be provided by OASIS in partnership with USA Multifamily Management, Inc. contracted by Harper's Pointe Senior, LLP, and Orange County Health Care Agency Behavioral Health Services. OASIS will also assist in marketing the housing project to potential clients through their outreach and engagement process. Additionally, OASIS will publicize this program to other agencies and programs. OASIS will work with their clients to determine the best housing options to meet the needs of the clients.

Application Process:
The selection of tenants will be based on the application date and eligibility factors. USA Multifamily Management, Inc. will maintain an ongoing site specific waiting list for the property which would include a notation regarding the applicant's MHSA eligibility. When an MHSA restricted unit becomes available the highest MHSA eligible applicant on the waiting list will be offered the unit. When a general unit becomes available, the client who is at the top of the list (whether or not MHSA eligible) would be offered the unit if they are otherwise qualified and meeting the general tenancy requirements such as income level. If the person who is offered the unit declines to take it, the unit would be offered to the next person: either the next highest MHSA eligible applicant for an MHSA restricted unit or the next person on the wait list for one of the general units. The first time that an applicant rejects a unit which has been offered, the applicant will retain their place on the waiting list. The second time that an applicant rejects an offered unit the applicant may request to stay on the waiting list but their application date would be changed to the date that they rejected the second offer

Tenant Screening:
The initial tenant screening may happen at the Harper's Pointe Senior apartments or at another suitable location. OASIS will verify the clients' eligibility for program enrollment including homeless or at risk of homelessness status by several means including client self-report, interviews with social service agencies, crisis houses, homeless shelter, day programs, police, and other sources when available and with authorization from the applicant. OASIS may assist MHSA enrolled clients through the Harper Pointe's tenancy application including assistance in obtaining necessary documentation. The property management company will conduct financial screening of applicants. If landlord references are not available, personal references, other than family members, will be required. Required references can be provided by staff of a homeless shelter, other homeless service with the applicant in a professional capacity together with as much information as possible about where the applicant has been living for the past 3 years. Landlord, personal, or other references must indicate the ability to care for the property and pay rent on time, as well as the ability to peacefully co-habit with other residents. The landlord reference check is conducted to determine that an applicant has:

- Demonstrated an ability to pay rent on time and in full
- Followed the rules and regulations
- Kept his or her residence in a clean and sanitary manner
- Kept his or her residence undamaged
- At no time received a notice for lease violation(s)
- Behaved as a good neighbor and resident

OASIS will provide services to tenants at the project to provide all necessary support during the application and screening process, including – if desired by the applicant – assisting the applicant to complete the required paperwork, securing required documentation, and accompanying the applicant during interviews with property management staff.

Fair Housing:
Harper's Pointe Senior, LLP, USA Multifamily Management, Inc. and OASIS will comply with Federal, State and local fair housing and civil rights laws and with all equal opportunity requirements. If a tenant requests a Fair Housing accommodation, the landlord will work with the tenant and grant reasonable accommodations based on the disability. Harper's Pointe Senior, LLP, USA Multifamily Management, Inc. or OASIS may request proof of the disability and the link between the disability and the requested accommodation. Before denying applicant occupancy, Harper's Pointe Senior, LLP, USA Multifamily Management, Inc. or OASIS will provide opportunities for the applicant to provide additional information about behaviors or conditions that are the basis for the denial as related to the disability.

Please refer to Sections A and B, the Orange County MHSA Program "Tenant Certification and Referral Process" for additional information.

D.4 Supportive Services Plan

The OASIS program is a Full Service Partnership contracted by Orange County Health Care Agency to provide voluntary, client centered, culturally sensitive mental health services. OASIS is a division of Providence Services Corporation, a national organization dedicated to the provision of accessible, effective, high quality community-based counseling and social services as an alternative to traditional institutional care. OASIS provides services throughout Orange County in locations that are comfortable and safe for clients. The program was created to meet identified service needs for older adults who were homeless or at risk of homelessness and have a serious and persistent mental illness. OASIS was formed as a result of the Mental Health Services Act and has been in operation since July of 2006. The program consists of a multiple disciplinary team of professionals all working together to improve the overall quality of life for participants in the program, helping them regain independence and achieve their goals. OASIS is dedicated to providing comprehensive services that are coordinated, proactive and effective in promoting wellness and recovery for homeless older adults with mental illness living in Orange County. The Mental Health Services Act in defining the eligibility for clients states: Older Adults 60 years and older with serious mental illness – including older adults with co-occurring disorders and a primary diagnosis of mental illness – who are not currently being served and have a reduction in personal or community functioning, are homeless, and/or at risk of homelessness or institutionalization, nursing home care, hospitalization and emergency room services. Older adults who are so underserved that they risk any of the above are also included.

PRIMARY SERVICE NEEDS OF THE TARGET POPULATION

The target population for this program consists of older adults, age 60 and above who have a serious and persistent mental illness and who are homeless or at risk of homelessness. The National Institute of Mental Health estimates that one in four Americans suffers from a diagnosable mental illness. Older adults in general face some unique issues which can lead to increased difficulty. Depression is very common among the older adult population as issues such as medical problems and death of peers is a frequent occurrence. Older adults are often isolated or reluctant to talk about their issues. Depression is such a major issue that the National Institute of Mental Health (NIMH) has reported that older adults are disproportionately likely to die by suicide compared to other age groups. Symptoms of depression can also be triggered by other chronic medical-related illnesses common in the older adult population. Older adults also often suffer from sleep problems, leading to increased depressive symptoms or self-medicating options such as overusing both prescription and over the counter medication or alcohol and drug abuse. The OASIS Geriatric pharmacist plays a very important role in assessing and educating participants on the potential dangers and adverse effects of medication non-compliance. Over half of the OASIS participants are diagnosed with some form of Major Depression and a significant percentage include a co-occurring disorder. Primary service needs include case management, assessment, psychiatric care, mental health services, educational and vocational services, co-

occurring disorder services, crisis intervention, medical support, peer support, and housing services to facilitate participants' journeys toward wellness and recovery. A significant goal of all participants in the program is establishing permanent housing and the ability to live independently. The independence level varies based on individual needs with the primary focus being a safe and stable environment which provides security and consistency. At OASIS, the philosophy is to meet clients where they are at, doing "whatever it takes" to collaboratively offer client centered services focused on recovery.

IDENTIFICATION OF LEAD SERVICE PROVIDER/OTHER SIGNIFICANT SERVICE PARTNERS

OASIS utilizes the recovery model philosophy in providing services that focus on helping participants to attain maximum independence by promoting participant strengths and self-identified goals and objectives. The program's multi-disciplinary staff partners with participants to offer a full array of mental health and case management services which are provided in the field or whatever location is convenient for the participant. OASIS participants have a range of goals, which call for flexibility in how and when services are provided. An important aspect of the program is that it provides intensive case management to this unserved/underserved population. The program is designed to respond to the needs of the older adult population who tend to have increased physical health ailments; therefore the staffing model also includes medical staff. To manage the program administratively, staffing includes a clinically licensed Program Director and Clinical Manager. Program staffing consists of Bachelor's and Master's level Personal Service Coordinators who are supervised by a Master's Level team leader, a Board Certified Geriatric Psychiatrist, Geriatric Pharmacist, Nurse Practitioner, Licensed Vocational Nurse and an Registered Nurse, Housing Specialist, and a Pre-licensed Therapist. Staffing also includes four paid part-time peer positions called Life Skills Coaches. These are individuals who have a mental health diagnosis and who have achieved independence and overcome any stigma associated with their diagnosis. They function as peer counselors to participants and offer a very insightful perspective. A full time Lead Life Skills Coach coordinates participant program activities and peer support groups. A Benefits Specialist and Data Analyst provide ongoing support to both participants and staff alike. Language capabilities among staff include bilingual Vietnamese, Spanish and Farsi.

The OASIS program offers a high staff ratio (1:16) of direct service clinical staff to participants and provides services in the community, with a significant amount of interaction provided at the participant's residences. Services are also provided at the OASIS office and public places, where the participants are familiar and feel safe. The services are provided through a contract with Orange County Health Care Agency with funding through the Mental Health Services Act.

DESCRIPTION OF KEY SERVICES

The OASIS program includes community based wrap-around recovery services that include: intensive case management, flexible funds for immediate needs such as housing, food or transportation, twenty-four hours a day-seven (7) days a week clinical availability, housing assistance, transportation assistance, medication support, co-occurring disorders treatment services, vocational and educational services, linkage to financial benefits/entitlements, family, peer support and support groups. Services are provided to assist participants in retaining and maintaining their housing.

Each participant interested in the OASIS program is assessed for appropriateness based on their individual needs. A full history is received during the initial assessment meeting including discussion about participants past and present living situation, history of mental illness, substance abuse issues, medical issues, financial situation, housing, social supports and more. Once admitted to the program, every participant assigned a dedicated Personal Service Coordinator (PSC) who works closely with them to reach their goals. The PSC functions as a case manager, providing primary oversight to participants on an individual basis and coordinating linkage to all services, both internal and external. The PSC provides ongoing assessment and support to participants through regular visits in whatever location is convenient for the participant. The PSC works in coordination with other OASIS staff such as the Housing Coordinator, Benefits Coordinator, Medical Team, and Life Skills Coaches to service the needs of the participant. The PSC is responsible for developing master treatment plans for each participant on their caseload and to provide individualized goals with plans to help participants establish a level of independence. The PSCs work collaboratively with the multi-disciplinary treatment team under the direction and guidance of the Clinical Manager.

OASIS employs a Data Analyst to provide ongoing data analysis through collaboration with OASIS and the County of Orange. Data is collected from a primary database and disseminated to provide ongoing feedback to the program on trends and outcomes in a wide variety of areas including, but not limited to residential reports, admission/discharge statistics, diagnosis queries, employment and volunteerism. The Data Analyst identifies discrepancies found in the data which is then shared with all appropriate parties to correct any errors. Data is shared with participants in the program and is also made public through posting on the County of Orange website. The collected data helps to identify trends and shifts and allows the opportunity for continued shaping of the program. The OASIS Benefits Coordinator is responsible for interacting with all participants upon admission and providing support throughout as needed to help manage any areas in regards to medical or financial benefits. This person works to ensure that participants apply for and receive entitlements that they are eligible for in order to further their goal of independence.

Typical Services Provided by OASIS Staff

- Intensive case management and service coordination, with personalized, focused treatment plans
- Symptom management, using counseling and psychotherapy services
- Medication education and/or medication support services Assistance with medication administration as needed, both on and off-site.
- Nursing staff work closely with medical providers, maintaining a relationship with a local clinic and coordinating care with participants who have their own medical provider.
- Linkage and financial support as needed to provide dental care for participants. The OASIS population often has severely neglected dental issues as many have had limited or no access to dental services.
- Education support to develop further independence for those who are interested in, and able to work or pursue educational endeavors.
- Mental health symptom management skills such as keeping appointments with doctors and labs and developing new ways to cope with stressful and general life situations without symptom exacerbation.
- Developing independent skills including, but not limited to budgeting, grooming, cleaning, cooking, and navigating public transportation.
- Developing coping skills to manage the following: crisis, relationships, conflict resolution, unhealthy thoughts, and help with family and social relationships
- Discussions regarding making positive choices, assessing harm potential and limiting possible adverse effects on daily living such as safety, medication compliance, healthy eating habits, etc.
- Drug and alcohol counseling, education, and linkage as indicated.
- Education and graduated practice accessing resources and referrals to build self-sufficiency and resiliency.
- Staff-led groups in a variety of topics including socialization, understanding emotions and feeling, crafts, and exercise groups tailored to the senior population.
- Vocational rehabilitation and educational skill development and assistance.
- Assistance with legal issues through referral and partnership with legal resources in the community.
- Assistance in obtaining benefits through a dedicated Benefits Coordinator. This individual works to provide a link with participants to Social Security or will work with Medicare-Medi-Cal to coordinate benefits for participants as possible. Every participant who comes into OASIS is reviewed for benefits. The Benefits Coordinator helps participants in filling out all necessary paperwork; will accompany them to appointments, and works with all PSC staff to coordinate services.
- Community-building to establish connections and stability for participants in their individual community including linkage as appropriate to senior centers, places of worship, medical care, and shopping.

- OASIS hosts a bi-weekly Ambassador's group which is comprised of program participants who have reached a level of recovery independence in their lives to the point where they desire to give back and share with others. Ambassadors act as the voice of the program participants and help shape activities and offered by the program. Ambassadors provide resources and emotional support to participants from the perspective of someone who has truly "been in their shoes." Ambassadors will work to coordinate speakers and help in designing social activities for participants in the program.
- OASIS participants are encouraged to participate in volunteer activities and often do so as away to "give back." A number of "participant-led" groups are offered as participants realize their strengths and desire to share this with others. Some of the groups include learning how to work on a computer, providing a painting class in water-colors, running a Tai Chi class, weekly Bingo, cooking of meals, and even a participant teaching other seniors how to use the Wii arcade system as a way to engage and stay in shape.

RECOVERY APPROACH

OASIS approaches services with the Recovery Model as its foundation. Recovery is the awakening of hopes and dreams. It is a deeply personal, unique process of understanding one's attitudes, values, feelings, goals, skills, and/or roles. It is a way of living a satisfying, hopeful, and contributing life. Recovery involves the development of new or rediscovered meaning and purpose in one's life as one grows beyond the effects of untreated mental illness. The recovery process involves gaining the knowledge to reclaim one's power and achieve one's desires by learning to make choices that bring strength rather than harm. It is essential that program participants who are facing the challenges of mental illness and homelessness obtain permanent housing as both a springboard and a platform for recovery to occur.

In-line with the recovery approach OASIS employs a team of Life Skills Coaches. These are consumer level staff who hold paid positions in the program. Each of the Life Skills Coaches has an "included diagnosis" similar to the program participants. This provides them with additional insight and highlights the fact that there is no reason for participants to be limited in their abilities to achieve success and they can achieve successes by effectively managing their own diagnoses. The role of Life Skills Coaches is to provide ongoing support and encouragement as a peer mentor to participants in the program. Rather than being assigned to specific participants similar to a PSC, the Life Skills Coaches work in conjunction with each other to provide services to all program participants. Life Skills Coaches may provide assistance in helping participants move into a new home or to assist them in obtaining clothing or food. They are often called upon to help ensure participants are able to make scheduled appointments in the community by providing transportation and individualized support depending upon the specific situation.

ASSESSMENTS AND TREATMENT PLANS

Each participant of OASIS receives an assessment that covers the major areas of one's life and is based on input from a wide variety of sources. The treatment plan focuses on the participant's strengths and identified areas of need. Each participant actively develops their Individual Recovery Plan. This plan contains goals and objectives which incorporates their unique strengths, needs, abilities, and preferences, as well as identified challenges and problems. All OASIS participants who live at the San Clemente property will have a Treatment Plan goal which includes housing stability. Through a combination of Mental Health Services, Supportive Services, and Housing Services, this is a goal which can be achieved by all participants. By obtaining stable and supportive housing, OASIS participants will gain a sense of belonging to an apartment community, and enjoy the feeling of being capable and able to live in a community setting. Participants will be empowered by supportive services that help them redevelop social and independent living skills. OASIS PSC's and Life Coaches may role model social and independent living skills and provide different options for addressing various situations and support participants as they try out new things. These staff will provide a range of off-site services as well, including linkages to community resources for food, entertainment, recreation, exercise, faith-based, mental health, medical and dental needs.

Due to the high frequency of depression in older adults, OASIS has a number of participants who have been hospitalized for suicidal ideation and want to reduce their suicidality. The participant and her/his assigned PSC will work together to develop a treatment plan and goal which includes preventive and responsive steps that the participant will take to reduce suicidal thoughts and feelings. For example, a peer of a resident may notice something different in the resident's behavior, perhaps a lack of desire to socialize or some increased anger in their interactions. This can be brought to the attention of the assigned PSC or other staff member on-site who will be able to "check in" on the resident. Through this peer support, participants can help each other and provide ongoing support to prevent adverse situations. In this case, the resident may have been down about something as innocuous as a television show focusing on death which brought up issues. The PSC or other OASIS staff will be able to process accordingly to ensure there is a plan and direction to deal with the situation.

Each participant's plan is reviewed and updated at least two times per year as participants achieve goals. OASIS functions in a team approach whereby treatment plans are developed and enhanced through discussion at the weekly multi-disciplinary treatment team. This team consists of a variety of levels of individuals all familiar with the individual participant, including the coordinating PSC, three peer level PSCs, the Clinical Manager, Life Skills Coaches, medical nurses, geriatric pharmacist, benefits specialist, housing coordinator, therapist and the nurse practitioner. The OASIS Psychiatrist or Nurse Practitioner will conduct a thorough clinical assessment and provide a complete diagnosis for each participant. This individual will also make the determination for the prescribing of psychotropic medication and will provide ongoing, regular assessment and medication evaluation. The Nurse Practitioner also reviews all clinical documentation presented by the

medical team to ensure accuracy. The geriatric pharmacist will perform a pharmaceutical assessment with all OASIS participants which includes, among other things, a brief cognitive assessment to ensure participant is able to understand the purpose of medication and the importance of following prescribed protocols. A great deal of education is provided to participants to help them understand the ramifications of medications; the older adult population tends to be on multiple medications and are often unaware of interactive effects and the importance of following prescribed protocols. The OASIS Clinical Manager is a licensed clinician who is responsible for oversight of all clinical services including approval of participant Master Treatment Plans. The Clinical Manager is also responsible for clinical review of all non-medical documentation provided by staff in their work with participants in the program. The Clinical Manager works closely with all PSCs ensuring clinically appropriate treatment planning. This person coordinates the multidisciplinary treatment team and works closely with the Quality Improvement Coordinator to effectively manage staff compliance with expected guidelines and documentation. The nursing staff work to provide general medical assessment and support to OASIS participants. This includes taking vitals, providing medical health assessments, assisting participants with medications, and coordinating services with medical providers in the community with referral and often transportation of participants.

PROJECT STAFFING

The Harper's Pointe project in Costa Mesa will consist of 7 designated MHSA units out of 53 planned apartments. The MHSA designated units will be integrated throughout the property as to eliminate any stigma attached by identifying individuals as MHSA clients. The project will be staffed by at least one Personal Service Coordinator (PSC) who will provide daily services at the residence. The PSCs will operate within the multidisciplinary treatment team which includes the Board Certified Geriatric Psychiatrist, Nurse Practitioner, Geriatric Pharmacist, Licensed Vocational Nurse, Registered Nurse, Program Director, Clinical Manager, Lead Personal Service Coordinator and Life Coaches with backgrounds in community mental health, drug/alcohol, educational/vocational rehabilitation and housing/ community services. The medical nursing staff will provide on-site visits at least monthly to meet with the participants. They will coordinate care with local medical providers in community as needed for each participant. As necessary, psychiatric assessments from the geriatric psychiatrist or nurse practitioner will be provided on-site. Structured group outings provided by OASIS staff will generally be provided by Life Skills Coaches who will provide regular visits to the property. Participants will be able to attend the OASIS Activity Center which is 15 miles away, however, it only requires riding on a single bus. As needs and interest dictate, groups will be offered onsite to participants to provide support in a variety of areas. OASIS will arrange for transportation for residents to participate in OASIS sponsored, agency-wide activities which are typically provided on-site or in the general north county area. The ultimate goal of the OASIS program is independence and transitioning away from dependency upon the OASIS Activity Center and office; rather, focusing on integration into the supportive community through established resources such as senior centers and community based organizations. For participants who are diagnosed with co-occurring substance abuse disorders, OASIS

works to find supportive resources in the participant's local community including connecting with groups such as 12-step programs.

COMMUNITY SERVICES

The Harper's Pointe site is conveniently located on a major street with bus stops located about 100 yards from the property. A major grocery chain and drug store are less than a mile away on the same street as the property with a bus stop directly in front. The Costa Mesa Senior Center is less than five miles away and is accessible via one bus line. Additionally, the center provides no-cost transportation to seniors living in Costa Mesa. Seniors are eligible for up to one free round-trip per day for medical or other transportation needs. The Costa Mesa Senior Center proudly offers more classes, activities and amenities than any other senior center in southern California. They provide a variety of activities ranging from knitting to Bingo to bridge to hula dancing. This center is a one-stop shop for senior resources and they offer financial counseling, transition programs to deal with loss of family members, legal counseling and even medical equipment loans. Costa Mesa is a large community which boasts 19 places of worship within one mile of the property and some within walking distance. They provide services in a variety of languages and work with their clients to ensure cultural competency. Just under one mile away is a full service medical center and hospital to meet any needs of the residents. The property will offer private office space for participants to meet with OASIS staff or other individuals. It will also feature a community activity room with on-site supportive activities and engagement opportunities to promote social and interpersonal interaction.

COMMUNICATION

The OASIS Housing Coordinator will be the primary point of contact between OASIS participants and Harper’s Pointe property management, having regular scheduled meetings to ensure a smooth flow of communication between the OASIS team and the property manager. The PSC and Housing Coordinator will meet with property management onsite to exchange information, review participants progress made toward goals and adjust level of support to ensure housing stability and address problems before they become crises. In addition, as an essential part of the OASIS service team, the Housing Coordinator meets with the assigned PSC, Life Coaches and assigned medical staff that ensure care for participants is coordinated in a timely manner, and individually and appropriately designed. Note that the Housing Coordinator would also follow-up with Harper’s Pointe management on an as-needed basis. The focus of the program is maintaining open communication and a collaborative relationship between all supportive service areas including OASIS staff, property management and local community resources.

Section D5: Supportive Services Plan Chart

Supportive Service	Target Population	Service Provider(s)	Service Location
Comprehensive Assessment	Older Adult	OASIS	On-site or Off-site (transportation provided)
Psychiatric Evaluation and Re-Evaluation	Older Adult	OASIS	On-site or Off-site (transportation provided)
Development of Coordinated Care Plan	Older Adult	OASIS	On-site and off-site working with participants
Ongoing Case Management	Older Adult	OASIS	On-site primarily
Mental Health Services	Older Adult	OASIS	On-site or Off-site
Medical screening, referral, and follow up	Older Adult	OASIS	Off-site initially, will schedule on-site
Medication support	Older Adult	OASIS	Off-site initially, will schedule on-site
Individual and Group Psychosocial Rehabilitation	Older Adult	OASIS	On-site or Off-site
Social Skills Development	Older Adult	OASIS	On-site or Off-site (transportation provided)
Life Skills Development	Older Adult	OASIS	On-site or Off-site (transportation provided)
New tenant orientation/move-in assistance/tenant rights education	Older Adult	OASIS	On-site
Tenants council	Older Adult	OASIS	On-site
Psychiatric services	Older Adult	OASIS	Off-site initially, will schedule on-site
Crisis intervention	Older Adult	OASIS	On-site or Off-site (transportation provided)
Information and referrals to other services and programs	Older Adult	OASIS	On-site or Off-site (transportation provided)
Peer mentoring/support	Older Adult	OASIS	On-site or Off-site (transportation provided)

Supportive Service	Target Population	Service Provider(s)	Service Location
Emergency financial assistance	Older Adult	OASIS	On-site or Off-site (transportation provided)
Recreational/socialization opportunities	Older Adult	OASIS	On-site or Off-site
Independent living/life skills: budgeting, money management, meal preparation, housekeeping, self-care	Older Adult	OASIS	On-site or Off-site (transportation provided)
Benefits assistance	Older Adult	OASIS	Off-site – can schedule onsite
Relapse prevention planning	Older Adult	OASIS	On-site or Off-site (transportation provided)
Community engagement and linkages	Older Adult	OASIS	On-site or Off-site (transportation provided)

Orange County MHSA Housing Program
Tenant Certification and Referral Process
Overview

The Mental Health Services Act (MHSA) Housing Program provides significant opportunities to provide permanent supportive housing to unserved and underserved persons with serious mental illness. Orange County developed the *Tenant Certification and Referral Process* for the MHSA Housing Program in order to ensure a fair and understandable process to connect MHSA enrolled consumers with housing. The *MHSA Tenant Certification and Referral Process* outlines the eligibility factors for housing units funded under the MHSA Housing Program.

SECTION A
MHSA Housing Program Certification and Referral

The County of Orange Health Care Agency (HCA) in collaboration with OC Community Services (OCCS) has developed a standardized application and certification process for the Orange County Mental Health Services Act Housing Program. The HCA MHSA Housing Program is the central point of coordination for MHSA Housing Program certification.

Application Process

The HCA MHSA Housing Program staff will certify applicants as MHSA Housing Program eligible using a standardized process for the MHSA funded units. The Tenant Certification and Referral Application is designed for MHSA Full Service Partnerships (FSPs) to complete in collaboration with the potential tenant. Upon enrollment in an FSP, the MHSA client can apply for MHSA Housing. Note that property management screening for housing will be conducted by the housing provider, and will be separate from eligibility determination for MHSA services.

Each site specific MHSA Housing Project Property Management company will accept applications from FSP enrolled clients during lease up of a new development and as vacancies in projects with MHSA Housing Program units become available, following the outreach and marketing outlined in the Marketing Plan. The HCA and its MHSA FSP providers will use culturally competent efforts to outreach to and engage members of the target population, including those among unserved or underserved ethnic communities and other minority populations, and will utilize a variety of proven outreach strategies to connect with and refer potential residents to FSPs. MHSA FSP outreach includes visiting areas known to be places where homeless adults spend their days and nights.

The referring MHSA FSP is responsible for documenting an applicant's eligibility utilizing the standard MHSA Housing Program Certification and Referral Application, by securing all required eligibility documentation; including a release of information authorizing the referring FSP to share certification information with the HCA MHSA Housing Program. It is expected the FSP will assist the applicant as needed in completing the certification application, as well as any additional requirements related to the project screening process. Support Service Workers/Personal Services Coordinators of the identified Full Service Partnership will provide support throughout the entire application and project screening process.

Eligibility Determination

The HCA MHSA Housing Program staff will review the application and supporting documentation for completeness and certify the applicant meets the Orange County MHSA Housing Program eligibility criteria. These criteria are outlined below and must all be met in order to be MHSA Housing Program eligible. If the application is incomplete, the HCA MHSA Housing Program staff will contact the referring FSP to request missing information.

MHSA Housing Program Threshold Eligibility:

1. Applicant has a Serious Mental Illness or Severe Emotional Disorder

Applicant is an adult 18 year or old with a verifiable serious and persistent mental illness as defined in Welfare and Institutions Code Section 5600.3 (b) (1) or a child or adolescent (<18 years old) with a severe emotional disorder as defined in Welfare and Institutions Code 5600.3 (a) (1).

2. Applicant is either "Homeless" OR "At-Risk of Homelessness"

   Homeless:
   "Homeless" means living on the streets, or lacking a fixed, regular, and adequate night-time residence. (This includes shelters, motels and living situations in which the individual has no tenant rights.)
   (Source: MHSA Housing Program Term Sheet.)

   At Risk of Homelessness:
   At risk of becoming homeless due to one of the following situations:

   (i) Transitional age youth exiting the child welfare or juvenile justice systems

   (ii) Individuals discharged from institutional settings including:

   - Hospitals, including acute psychiatric hospitals, psychiatric health facilities (PHF), skilled nursing facilities (SNF) with a certified special treatment program for the mentally disordered (STP), and mental health rehabilitation centers (MHRC)
   - Crisis and transitional residential settings

   (iii) Released from local city or county jails

   (iv) Temporarily placed in a residential care facility upon discharge from (ii) or (iii) above.

   (v) Certification by the county mental health director as an individual who has been assessed by and is receiving services from the county mental health department and who has been deemed to be at imminent risk of being homeless.

   (Source: MHSA Housing Program Term Sheet.)

3. Applicant had difficulty obtaining/maintaining housing

   In addition to being either homeless or at-risk of homelessness, the certification must demonstrate that the issues and/or conditions that establish the individual's eligibility for the housing program are the same issues and/or conditions that significantly interfere with his/her ability to obtain and maintain housing; and without services linked to the MHSA Housing Program, the individual will not be able to obtain or maintain housing.

4. Eligible for MHSA services

   Applicant is enrolled in an MHSA FSP program funded and approved by the State as part of the County's Community Services and Support Plan. In Orange County, other factors besides mental illness and homelessness that contribute to MHSA eligibility include:

   - Functional impairments due to an untreated or under-treated mental illness that prevents engagement in meaningful activities and inability to remain in housing.
   - Frequent incarceration or psychiatric hospitalizations due to untreated or under-treated illness.
   - Special consideration is given to the ethnically and culturally unserved/ underserved populations among the homeless and mentally ill, especially in the Latino and Asian/Pacific Islander communities.

Note that the Property Management of each project will verify applicants' income, along with other eligibility factors, in relation to the funding restrictions on the MHSA Housing Program rental units.

Certification Denial

If the certification is denied because the prospective tenant did not meet the MHSA Housing Program criteria, the referring MHSA FSP and the prospective tenant is notified and informed of the reason for the denial in writing, as well as a phone call from the HCA MHSA Housing Program staff. The referring FSP and/or prospective tenant may resubmit the application for reconsideration if the conditions that resulted in the original denial change.

SECTION B:
MHSA Housing Unit Marketing and Tenant Selection

HCA MHSA housing staff certifies applicants as to their eligibility for the MHSA Housing Program. The site specific property management company will conduct the marketing of units as well as the selection of a tenant for a specific unit. The next section discusses the process by which units are marketed to potential applicants and then how MHSA-certified applicants are selected as tenants for MHSA Housing Units

Notification of Unit Availability

As MHSA Housing Program units become available, the prospective tenants are notified through the following process:

1. The Project Sponsor/Developer or Property Management Company will post vacancies using the marketing plan described in the MHSA Housing Application (as described in section D.13 of the MHSA Housing Application).

2. Prospective tenants apply for tenancy at the specific MHSA Housing Program funded site. The prospective tenant will directly approach the Property Management Company to inquire about applying for tenancy for one of the units. The prospective tenant will complete the MHSA Housing Program Certification Application and, working with the Property Manager and Full Service Partnership provider(s), will submit this Certification Application to the HCA MHSA Housing Program. HCA MHSA will provide confirmation of MHSA housing unit eligibility to the applicant, the property management company, and the Full Service Partnership Provider if the applicant meets the MHSA Housing Program criteria.

3. Each individual MHSA property will maintain a site specific wait list, keeping it current by contacting the prospective tenant/referring FSP on a regular basis (as defined in their site specific property management plan) to query their continued interest in an MHSA funded unit.

Project Waiting List

Each MHSA Housing Program funded development will have a discrete screening protocol that is site-specific as outlined in section D.13 of the MHSA Housing Program application. Applications will be

processed in the order in which they are received. If no units are available, eligible applicants will be placed on the property management's project waiting list, upon favorable review of a credit report and criminal background check. The processing of credit and criminal reports does not assure, nor does it imply, that an application will be approved, or that property management is preparing a particular application for a unit that may be available. Additional tenant selection criteria for the property, as outlined in the project specific tenant selection plan, also apply.

Property Management Screening

The MHSA FSP enrolled applicant will be screened by the property manager and is expected to include review of the completed project-specific housing application, credit report, and criminal history check. Applicants successfully passing this screening will be placed on a property management waiting list (see above), if necessary, with third-party income verification, review of landlord and/or other references, and collection of verification forms from the Health Care Agency occurring as the final step for obtaining a specific available unit.

Screening Assistance to the Applicant

The FSP(s) providing services to tenants at a particular project will provide all necessary support during the screening process, including -- if desired by the applicant - assisting the applicant to complete the required paperwork, securing required documentation, and accompanying the applicant during interviews with property management staff.

References

If landlord references are not available, personal references, other than family members, will be required. Required references can be provided by staff of a homeless shelter, other homeless service providers, social workers or others involved with the applicant in a professional capacity, together with as much information as possible about where the applicant has been living for the past 3 years. Landlord, personal, or other references must indicate the ability to care for the property and pay rent on time, as well as the ability to peacefully co-habit with other residents. The landlord reference check is conducted to determine that an applicant has:

- Demonstrated an ability to pay rent on time and in full,
- Followed the rules and regulations,
- Kept his or her residence in a clean and sanitary manner,
- Kept his or her residence undamaged,
- At no time received a notice for lease violation(s),
- Behaved as a good neighbor and resident

Notice of Decision

Property Management will provide applicants written notification of assigned waiting list number or reason for denial after consideration of the credit and criminal background checks. The applicant will also be given written notification by Property Management of specific occupancy date or reason for denial after final processing. All notices of denial will include information on the right to appeal and a reminder notice of the right to reasonable accommodation for disability. A copy of any denial notice for MHSA enrolled applicants will also be sent to the Full Service Partnership(s) identified as the service provider(s) for the property. In the event of successful application for the housing, the FSP(s) will be available to assist the tenant in making arrangements for and completing the move-in process.

Fair Housing

This project will comply with all federal, state, and local fair housing and civil rights laws, as well as with all equal opportunity requirements during marketing, rent-up and ongoing operations. Specifically, the project is committed to requirements of Title VI of the Civil Rights Act of 1964, Title VIII and Section 3 of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974), Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Fair Housing Amendments of 1988, and legislation which may subsequently be enacted protecting the individual rights of residents, applicants, or staff.

The project will not discriminate against prospective residents on the basis of the fact of perception of their race, religion, creed, national origin, age, color, sex, blindness or other physical or mental disability, marital status, domestic partner status, ancestry, actual or perceived sexual orientation, gender identity, AIDS, AIDS-Related Complex, HIV, medical condition, height, weight, political affiliation or other consideration made unlawful by federal, state or local laws.

The project will not discriminate against prospective residents on the basis of their receipt of, or eligibility for, housing assistance under any Federal, State or local housing assistance program or on the basis that prospective residents have minor children. While the Property will not discriminate against those using Section 8 certificates or vouchers or other rental assistance, applicants with such rental assistance must meet all eligibility requirements. The Property will work closely with legal counsel and regulatory agencies throughout the marketing and outreach process to ensure full compliance with all applicable requirements.

Reasonable Accommodation and Right to Appeal

All applicants will be given notice in the project specific application package of their right to reasonable accommodation as well as their right to appeal screening decisions. All background information obtained from credit reports, criminal history checks and/or landlord or other personal references will be considered in the light of the project's commitment to provide housing for people in transition who have special needs. Applicants with negative background information will have the opportunity to demonstrate that past behavior causing those issues was related to a disability and request reasonable accommodation. The availability of supportive social services that can assist the applicant in meeting the conditions of tenancy may also be considered in evaluating such information.

All notices of denial will include information on the right to appeal and reminder notice of the right to reasonable accommodation for disability.