

July 31, 2018

Office of the Legislative Fiscal Analyst  
House Building, Suite W310  
Salt Lake City, Utah 84114

Dear Office of the Legislative Fiscal Analyst:

On behalf of The Road Home's Board of Trustees, please find attached our written report on the status of all recommendations from the Office of the Legislative Auditor General's report, *A Limited Review of Three Facilities Operated by The Road Home*, as requested by the Chairs of the Social Services Appropriations Subcommittee of the Utah State Legislature.



Support and  
Shelter for  
Overcoming  
Homelessness

Sincerely,

Gregory M. Johnson  
The Road Home Board of Trustees, President-Elect

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Report to the Legislative Fiscal Analyst  
On the Status of Recommendations from the Legislative Auditor General's  
*A Limited Review of the Three Facilities Operated by The Road Home*  
August 1, 2018

On June 23, 2018, the Board of Trustees of The Road Home voted to approve a new process for its adoption of agency policies that guide procedures that staff members follow in each of the agency's programs. The Board also voted to approve a new safety and security plan, and a pilot safety project and voted in a new member of the Board who has experience of homelessness.

Status of the three recommendations provided by the auditors:

1. *We recommend that the Board of Trustees for The Road Home and the Board of Trustees for Shelter the Homeless consider what standards of conduct will be required of those residing in their facilities and how to enforce those standards.*

The Road Home has revised its Guest Expectations in emergency shelter and its House Rules in permanent supportive housing. We have developed Expectation Protocol Matrices for the Salt Lake Community Shelter, the Midvale Family Resource Center, and Permanent Supportive Housing (including Palmer Court). The Expectation Protocol Matrices outline behavior violations and staff responses. Copies of the Expectation Protocol Matrices and Palmer Court House Rules are attached. The Road Home will utilize these documents to ensure standards of conduct and enforcement in each of the facilities that it operates in conjunction with Shelter the Homeless.

The Road Home Board has re-affirmed Low-Barrier Shelter and Housing First as guiding principles of the agency that remove barriers to entry, adopt client-centered service methods, and help families and individuals move quickly into permanent housing. A copy of The Road Home's Guiding Principles are attached.

Low barrier access can and must include important expectations of guests and staff members in order to provide for a safe facility. Our shelters serve as the last best alternative for people who would be otherwise forced to stay outside. Our organization must maintain our standard of helping people into shelter, not screening people out of shelter. When helping people to secure access into shelter, our agency is helping people to gain access to services and begin their journey out of homelessness. By imposing exclusionary policies and procedures, our agency and our community are compromising people's personal safety, health, and wellbeing. Our commitment to helping people gain access into our facilities should not come at the expense of others' personal safety. There are situations when a person is violent that would preclude their ability to stay in one of our facilities. In those cases, our

team will work with security and law enforcement to address the needs of an individual who is behaving in a manner which jeopardizes the safety of others.

The Road Home has prepared standards of conduct and enforcement in each of the facilities that it operates in conjunction with Shelter the Homeless. We have selected members of our board to work on the committee and our Board President reached out to Shelter the Homeless with the goal of establishing working dialogue that results in ongoing policy oversight.

2. *We recommend that the Board of Trustees of The Road Home and its management adopt written policies and procedures for the intake process and ensure all staff follow them.*

The Board of The Road Home has adopted written procedures for the check-in process which include a thorough and consistent bag search, posting new signage, and adopting the Expectation Protocol Matrices which outline actions that staff will take to address guests who are not following expectations such as those found with prohibited items.

Procedures adopted regarding the intake/check-in process are attached in Attachment B and include:

- Bag Search Procedure
- Staff Training and Oversight Procedure
- Barred Guest Procedure

These procedures are written considering our current resources and will be amended as needed if we are successful in obtaining additional funding for full implementation of our Safety and Security Plan.

From July 11 to July 25, 2018, The Road Home, in collaboration with Shelter the Homeless, the Department of Public Safety and the Department of Workforce Services, operated a two-week pilot of the check-in process in the men's shelter to test out that portion of our new Safety and Security Plan. Through resources raised by The Road Home and Shelter the Homeless, we installed a walk-through metal detector and hired two additional Kane Security officers to staff the detector 24 hours a day, 7 days a week. The Road Home staff checked the men in, assigned beds and completed the bag search. The men then emptied their pockets, walked through the metal detector and, if indicated, Kane officers followed up with a wand search.

During the pilot, we saw 26 instances of prohibited items found during the check-in process and 6 instances of prohibited items found in the men's dormitory. We also tracked and analyzed the number of men seeking shelter each night to see if there were changes as a result of the higher security. We saw numbers that were

consistent with normal variation for this time of year. A full report of the pilot is attached.

The Road Home with input from its partners, including Shelter the Homeless, the Department of Workforce Services, and the Department of Public Safety, implemented a number of safety improvements listed in this document, as well as developed a comprehensive safety plan that will need additional resources to implement.

As part of the proposed plan, The Road Home would create spaces within the current facility to separate and provide additional support to (1) individuals who have had multiple substance use related violations and (2) individuals who are engaged in treatment or actively seeking treatment and sobriety support. We recognize that this plan is based on current available options in our system and that the community is addressing the question of how and where to provide resources to those who are turned away from shelter in the future. The Road Home is engaged in these discussions and if funded, would use information from our new program to inform the services in the new Resource Centers in Salt Lake County.

Full implementation of our proposed plan would allow our community to provide options for those who would otherwise be turned away from shelter. On June 23, 2018, The Road Home Board voted to approve a new 12-month process to review and approve all agency policies.

3. *We recommend that the Board of Trustees of The Road Home and its management team define the expectations that they have of residents and staff, adopt clear written policies, and ensure all policies are followed by staff. Policies might include the following:*
  - a. *Standards of cleanliness at Palmer Court Apartments*
  - b. *Conditions that must be met to qualify for a companion animal and the number of companion animals allowed*
  - c. *Measures to be taken when residents are found to be using drugs, selling drugs, or otherwise abusing controlled substances*
  - d. *The response when residents at Palmer Court fail to pay their rent*

The Road Home Board and its management team have revised and approved the Guest Expectations in shelter, the House Rules at Palmer Court, and Expectation Protocols for (1) the Salt Lake Community Shelter, (2) the Midvale Family Resource Center and (3) Permanent Supportive Housing including Palmer Court. (Attachments – see page 1)

- a. Palmer Court Management maintains a standard of cleanliness throughout the entire complex, including the grounds, the common areas, and each apartment. In order to maintain this standard, Palmer Court property management inspects all

units four times annually. Units that fail inspection are placed on a monthly inspection plan until they meet acceptable cleanliness conditions. The property management and case management teams work with individuals whose disabilities affect their ability to keep their apartment clean by providing assistance with cleaning, contracting with outside cleaners and working with partner agencies. The Board of Trustees will review data and outcomes on a monthly basis. A copy of Palmer Court's Apartment Inspections Procedure and 1 bedroom inspection checklist are attached.

We will measure maintenance of cleanliness standards by tracking the following:

- Number of units passing quarterly inspections
- Number of units passing re-inspection (within 30 days)
- Number of units inspected three times a quarter

b. Our property management team has consulted with legal counsel and ensured that our processes and procedures for service and companion animals are in compliance with the Americans with Disabilities Act and Section 504 of the Fair Housing Act of 1973. Copies of Palmer Court's assistance animal procedure and agreement are attached.

The Road Home will ensure compliance with state and federal laws regarding assistance animals by tracking the following:

- Number of assistance animal agreements signed initially and then monthly
- Number of assistance animals at Palmer Court
- Number of written violations to residents/assistance animal owners

c. We have reviewed and updated Palmer Court documents related to use and selling of illegal substances. Tenants will be given a copy of the revised House Rules and provided with a 30 day notice of changes; the rules will go into effect by the end of August 2018. The updated documents include House Rules, Drug and Alcohol Use Addendum to the Lease Agreement, Substance Use and Suspected Substance Dealing Protocol and Palmer Court-Permanent Supportive Housing Security/Incident Protocol Matrix. A copy of the Drug and Alcohol Use Addendum to the Lease Agreement is attached.

Management will track measures taken in response to substance use by measuring the following:

- Number of disruptive substance use behaviors that result in a substantial lease violation
- Number of behavior contracts issued by case management/property management
- Number of 3-day to comply with lease or vacate notices
- Number of lease terminations due to substance use related issues

The Road Home is committed to keeping drug dealing out of Palmer Court. Management will work proactively in concert with law enforcement to immediately identify any suspected drug dealing. Management will fully support law enforcement in its efforts to apprehend anyone attempting to distribute illegal substances on our property and will track the following:

- Number of police calls/notifications of reported substance dealing
  - Number of lease violations and terminations for substance dealing
- d. The Road Home will ensure that it upholds its responsibility to meet the revenue goals in its annual budget through collecting rents in a manner that maintains a standard of no greater than the annual budgeted rent loss. Staff will work diligently with tenants to overcome any personal barriers that limit their ability to meet their rent obligations and will provide opportunities for tenants in arrears to make up for their shortfalls in order to avoid eviction.

Members of the Board of Trustees have reviewed our documentation regarding response protocol when tenants are behind on rent payments. Applicable documents are attached. Information on past due rents will be included in a monthly report to the Board.

We will track rental revenue at Palmer Court by reporting each month:

- Number of statements issued for failure to pay rent
- Number of residents who pay rent on time
- Number of residents who qualify and participate in rent collection and forgiveness program
- Number of 3-day pay or vacate notices and lease terminations for failure to pay rent

These measures will show improvements in unit cleanliness, arrangements for assistance animals, detection and resolution of substance use, eradication of substance dealing violations, and rent collection.

The Board of Trustees will regularly review a dashboard of key performance indicators to monitor staff compliance with stated procedures and protocols.

## **Actions Already Taken and/or Underway**

### **All Three Facilities:**

- Posted anonymous tip line flyers in all three facilities to encourage everyone to report suspected use or any other suspected illegal activities.

- Developed a comprehensive rounding checklist for each of the three facilities, which includes team members signing and initialing the checklist of specific procedures to be performed during rounds. Rounding data will be included as a key performance indicator.
- Working in conjunction with the State of Utah Department of Workforce Services, Department of Public Safety, Shelter the Homeless, and private security, The Road Home has produced a Safety and Security plan and we are working with Shelter the Homeless to seek resources needed for full implementation. The proposal includes the addition of private security to supplement the team of the two security officers who are currently working in the downtown shelter. The additional officers would help with the operation of the metal detectors and oversee The Road Home staff bag checks on an ongoing basis through June 2019.

**Salt Lake Community Shelter:**

- Developed and implemented the Expectation Protocol.
- All door alarms have been checked and repaired, and door checks are now incorporated into regular building rounds.
- Re-keyed all building entrances and hallways to improve building security.
- Completed the initial re-structuring of the shelter staff and separated the supervision of the shelter desk staff and the shelter maintenance and cleaning staff into two positions. Hired a new Shelter Director to manage the desk and services teams for the men's and women's shelters.
- Implemented our revised procedure for oversight of the bag search and check-in process. Installed an additional security camera to provide more thorough monitoring of activity at the men's bag check and metal detection area.
- Re-trained all staff on bag search procedures and provided corrective action to staff members who did not consistently follow procedures.
- Installed new signage regarding Guest Expectations and Prohibited Items outside the building entrances and in the lobbies.
- Installed walk through metal detector purchased by Shelter the Homeless and began using it on July 11, 2018.

- Conducted a two-week pilot project to test the efficacy of the check-in process portion of our proposed security plan and refine this processes to implement the best process possible.
- Worked with an architect to design a new exit door system for the men's shelter lobby. The new door system is on order and will be installed in August 2018. This new system creates a better barrier to prevent any unauthorized entry or exchanges of non-checked goods that may occur as a result of the current men's lobby design.

**Midvale Family Resource Center:**

- Developed and implemented the Expectation Protocol.
- Purchased metal detecting wands for use when necessary during safety check at the Midvale facility.
- In addition to searching all belongings of guests who have been identified as bringing in prohibited items, we have implemented weekly random searches of one or more guests who have past violations.
- Implemented a wand and bag search for individuals who enter after curfew or have suspicious behaviors. An example might include a person exhibiting behavioral changes that accompany frequent coming in and going out of the shelter continuously.
- We are upgrading our entrance door, giving staff the ability to lock and buzz in guests when needed in order to have a more controlled entrance. This project is expected to be completed in early August 2018.
- Implemented a frequent walk through of the guest dorm area with the Unified Police Department and/or Department of Public Safety drug sniffing dog(s).
- Met with the Unified Police Department Midvale Division on May 30, 2018 to review our safety and security procedures and discuss the use of a walk through metal detector for Midvale. We have incorporated Unified Police Department Midvale Division's input into our revised procedures.

**Palmer Court:**

- Hired a private contractor to produce a safety assessment of Palmer Court. The assessment will help us identify areas that could be addressed to provide greater safety and security, and we expect to have the assessment and recommendations in early August 2018.

- Revised House Rules and Drug and Alcohol addendum to the lease to reflect current Housing First best practices.
- Developed and implemented the Expectation Protocol with staff instruction for follow-up on violations at Palmer Court.
- Consulted with counsel and revised Companion/Comfort Animal procedure and agreement and Service Animal procedure and agreement.
- Conducted updated analysis of tenants with rent debt. Continue to implement the Rent Collection process for those with back rent.
- Obtained bid on new door system to control access between family (West) and individual (East) side of the building.
- Checked and made any necessary repairs to all cameras. Cut back foliage to ensure complete camera views. Incorporated camera checks into our daily building rounds.
- Cleaned out and removed 5 storage pods located on the east side of the building to allow for better view of the property.
- Installed new key code lock on State Street pedestrian gates.
- Repaired exterior lights around the property.
- Installed new door access on all the side entrance doors. We replaced our card access system for our six exterior side doors on the north and south side of the property. This involved running wiring from all the doors to the new switch controls located in the hallways and communication room. This replaces the wireless system that we had previously. The system runs exactly the same as our other system as far as how the Resident Advocates let people in the side doors with the intercom system and how the computer software works. This change will improve reliability of the side door to control access to the facility.
- Met with the “Powerful Moms Who Care” group. This is a group of women living in Palmer Court who are working with Crossroads Urban Center and learning to become effective advocates. Our team works with this group to learn their safety concerns and how we can work together to address them. We have reviewed their written list of concerns and recommendations and sent them a written response. We asked to attend an upcoming meeting to explore potential solutions.
- Installed new bike rack in a safe area within the courtyard.



# Salt Lake Community Shelter and Resource Center

## EXPECTATION PROTOCOLS

**Purpose:** In order to properly classify and respond to incidents occurring within our shelter facilities, the following standards have been set to guide decision making and response by facility staff. **\*Supervisor and Situational Discretion:** Supervisors are expected to exercise discretion in handling each situation based on the severity of the issue(s) and circumstances involved. Depending on the seriousness of the issue(s), steps can be repeated or omitted if the facts of the situation warrant it; there may be situations where a guest is exited or barred from a facility without progressing through the steps outlined here. Supervisors are encouraged to work with Case Managers and Human Resources to determine the proper process and response or grievance when applicable. Severe weather conditions may also result in amended responses to ensure undue harm to guests is not inflicted.

Category of Violation	Examples (Not All Inclusive)	Response
<b>Violation A:</b> <ul style="list-style-type: none"> <li>Minor, non-violent rule violation</li> <li>No police call or arrests made</li> <li>No imminent danger present</li> <li>Potentially overturned immediately by supervisors based on severity</li> </ul>	<ul style="list-style-type: none"> <li>Possession of alcohol (Expectation #2 – upholding federal/state laws)</li> <li>Unable to complete Activities of Daily Living (Expectation #3 – maintain personal hygiene)</li> <li>Accessing unauthorized area of shelter (Expectation #4 – threatening behavior towards others)</li> <li>Vandalism (Expectation #4 – threatening behavior towards the facility)</li> <li>Abusive language or behavior (non-threatening) (Expectation #4 – threatening behavior towards others)</li> </ul>	<b>First Violation:</b> <ul style="list-style-type: none"> <li>Loss of bed for night</li> <li>Or, no entry before 10 PM if warranted</li> <li>Meeting with supervisor</li> </ul> <b>Second Violation:</b> <ul style="list-style-type: none"> <li>Up to five day exit</li> </ul> <b>Third and Subsequent Violations:</b> <ul style="list-style-type: none"> <li>Up to 30 day exit</li> <li>Behavior Contract</li> </ul>
<b>Violation B:</b> <ul style="list-style-type: none"> <li>Severe, non-violent rule violation</li> <li>Possible call to police for arrest</li> <li>May result in bar from facility</li> <li>Requires review by supervisor before re-entry to facility</li> </ul>	<ul style="list-style-type: none"> <li>Smoking in the building (Expectation #2 – upholding federal/state laws)</li> <li>Possession of drug paraphernalia (Expectation #2 – upholding federal/state laws)</li> <li>Possession of drugs (personal use) (Expectation #2 – upholding federal/state laws)</li> <li>Destruction of property (Expectation #2 – upholding federal/state laws)</li> <li>Possession of other weapon (Expectation #4 – threatening behavior towards others)</li> <li>Threats against staff (Expectation #4 – threatening behavior towards others)</li> <li>Stealing (Expectation #4 – threatening behavior towards others)</li> </ul>	<b>First Violation:</b> <ul style="list-style-type: none"> <li>30 day exit</li> </ul> <b>Second Violation:</b> <ul style="list-style-type: none"> <li>90 day exit</li> </ul> <b>Third and Subsequent Violations:</b> <ul style="list-style-type: none"> <li>90 day exit</li> <li>Behavior Contract</li> </ul>
<b>Violation C:</b> <ul style="list-style-type: none"> <li>Severe, violent rule violation</li> <li>Required call to police for arrest</li> <li>Immediate bar from facility</li> <li>Requires review by supervisor before re-entry to facility</li> </ul>	<ul style="list-style-type: none"> <li>Possession of drugs (intent to distribute, determined by police) (Expectation #2 – upholding federal/state laws)</li> <li>Possession of firearm (Expectation #4 – threatening behavior towards others)</li> <li>Assault on other guest (Expectation #4 – threatening behavior towards others)</li> <li>Assault on staff (Expectation #4 – threatening behavior towards others)</li> <li>Use of weapon (Expectation #4 – threatening behavior towards others)</li> </ul>	<b>First Violation:</b> <ul style="list-style-type: none"> <li>Immediate exit from shelter, 1 year duration</li> <li>Trespassed from facility/agency</li> <li>Police call</li> </ul> <b>Second Violation:</b> <ul style="list-style-type: none"> <li>Open ended exit from facility/agency until reviewed by Executive Director</li> <li>Trespassed from facility</li> <li>Police call</li> </ul>



# Midvale Family Resource Center EXPECTATION PROTOCOLS

**Purpose:** In order to properly classify and respond to incidents occurring within our shelter facilities, the following standards have been set to guide decision making and response by facility staff.

**\*Supervisor and Situational Discretion:** Supervisors are expected to exercise discretion in handling each situation based on the severity of the issue(s) and circumstances involved. Depending on the seriousness of the issue(s), steps can be repeated or omitted if the facts of the situation warrant it; there may be situations where a guest is exited or barred from a facility without progressing through the steps outlined here. Supervisors are encouraged to work with Case Managers and Human Resources to determine the proper process and response or grievance when applicable. Severe weather conditions may also result in amended responses to ensure undue harm to guests is not inflicted.

Category of Violation	Examples (Not All Inclusive)	Response
<p><b>Violation A:</b></p> <ul style="list-style-type: none"> <li>Minor, non-violent rule violation</li> <li>No police call or arrests made</li> <li>No imminent danger present</li> <li>Potentially overturned immediately by supervisors based on severity</li> </ul>	<ul style="list-style-type: none"> <li>Possession of alcohol (Expectation #4 – ensuring safety)</li> <li>Unable to complete Activities of Daily Living (Expectation #3 – maintaining good personal hygiene)</li> <li>Accessing unauthorized area of shelter (Expectation #4 – ensuring safety)</li> <li>Vandalism (Expectation #4 – threatening behavior towards the facility)</li> <li>Abusive language or behavior (non-violent) (Expectation #4 – threatening behavior towards others)</li> <li>Child left unattended by adult in shelter (Expectation #2 – upholding federal/state laws)</li> </ul>	<p><b>First Violation:</b></p> <ul style="list-style-type: none"> <li>Loss of bed for night for individuals in 2-parent families</li> <li>Meeting with supervisor, director, or shift lead</li> <li>Day-time building exits for single parents with Children</li> <li>DCFS call in cases of child endangerment</li> </ul> <p><b>Second Violation:</b></p> <ul style="list-style-type: none"> <li>Up to five day exit for individuals in 2-parent families</li> <li>Day-time building exits for single parents with Children</li> <li>DCFS call in cases of child endangerment</li> </ul> <p><b>Third and Subsequent Violations:</b></p> <ul style="list-style-type: none"> <li>Up to 30 day exit for individuals in 2-parent families</li> <li>Day-time building exits for single parents with children</li> <li>Behavior Contract</li> <li>DCFS call in cases of child endangerment</li> </ul>
<p><b>Violation B:</b></p> <ul style="list-style-type: none"> <li>Severe, non-violent rule violation</li> <li>Possible call to police for arrest</li> <li>May result in bar from facility</li> <li>Requires review by supervisor before re-entry to facility</li> </ul>	<ul style="list-style-type: none"> <li>Smoking in the building (Expectation #2 – upholding federal/state laws)</li> <li>Possession of drug paraphernalia (Expectation #2 – upholding federal/state laws)</li> <li>Possession of drugs (personal use) (Expectation #2 – upholding federal/state laws)</li> <li>Destruction of property (Expectation #2 – upholding federal/state laws)</li> <li>Possession of other weapon (Expectation #4 – threatening behavior towards others)</li> <li>Threats against staff (Expectation #4 – threatening behavior towards others)</li> <li>Stealing (Expectation #4 – threatening behavior towards others)</li> </ul>	<p><b>First Violation:</b></p> <ul style="list-style-type: none"> <li>30 day exit for individuals in 2-parent families</li> <li>Day-time building exits for single parents with Children</li> <li>DCFS call in cases of child endangerment</li> </ul> <p><b>Second Violation:</b></p> <ul style="list-style-type: none"> <li>90 day exit for individuals in 2-parent families</li> <li>Day-time building exits for single parents with</li> </ul>



# Midvale Family Resource Center EXPECTATION PROTOCOLS

<p><b>Violation C:</b></p> <ul style="list-style-type: none"> <li>• Severe, violent rule violation</li> <li>• Required call to police for arrest</li> <li>• Immediate bar from facility</li> <li>• Requires review by supervisor before re-entry to facility</li> </ul>		<p>children</p> <p><b>Third and Subsequent Violations:</b></p> <ul style="list-style-type: none"> <li>• 90 day exit for individuals in 2-parent families</li> <li>• Behavior Contract</li> <li>• Day-time building exits for single parents with children</li> </ul> <p><b>First Violation:</b></p> <ul style="list-style-type: none"> <li>• Immediate exit from shelter, 1 year duration</li> <li>• Trespassed from facility/agency</li> <li>• Police call</li> <li>• DCFS call</li> </ul> <p><b>Second Violation:</b></p> <ul style="list-style-type: none"> <li>• Open ended exit from facility/agency until reviewed by Executive Director</li> <li>• Trespassed from facility</li> <li>• Police call</li> <li>• DCFS call</li> </ul>
<ul style="list-style-type: none"> <li>• Possession of drugs (intent to distribute, determined by police) (Expectation #2 – upholding federal/state laws AND Expectation #4 – threatening behavior towards others)</li> <li>• Possession of firearm (Expectation #2 – upholding federal/state laws AND Expectation #4 – threatening behavior towards others)</li> <li>• Assault on other guest (Expectation #2 – upholding federal/state laws AND Expectation #4 – threatening behavior towards others)</li> <li>• Assault on staff (Expectation #2 – upholding federal/state laws AND Expectation #4 – threatening behavior towards others)</li> <li>• Use of weapon (Expectation #2 – upholding federal/state laws AND Expectation #4 – threatening behavior towards others)</li> </ul>		



# Palmer Court – Permanent Supportive Housing EXPECTATION PROTOCOLS

**Purpose:** In order to properly classify and respond to incidents occurring within our housing facilities, the following standards have been set to guide decision-making and response by facility staff.

**Lease and House Rules:** All residents sign a lease agreement and House Rules prior to moving in to Palmer Court. These documents outline expected behaviors and behaviors or acts that could result in violations or termination of the lease. Any exceptions will be handled on a case by case basis and in consultation with Property Management and Case Management teams.

**\*Supervisor and Situational Discretion:** Supervisors are expected to exercise discretion in handling each situation based on the severity of the issue(s) and circumstances involved. Depending on the seriousness of the issue(s), steps can be repeated or omitted if the facts of the situation warrant it; there may be situations where a resident is terminated from the facility without progressing through the steps outlined here. Supervisors are encouraged to work with Case Managers and Human Resources to determine the proper process and response or grievance when applicable. Some conditions may also result in amended responses to ensure undue harm is not inflicted upon residents.

Category of Violation	Examples (Not All Inclusive)	Response
<p><b>A) Minor Lease Violation:</b></p> <ul style="list-style-type: none"> <li>• Minor house rule violation</li> <li>• No police call or arrests made</li> <li>• No imminent danger present</li> <li>• Potentially overturned immediately by supervisors based on severity and/or a behavioral contract</li> </ul>	<ul style="list-style-type: none"> <li>• Damage to property</li> <li>• Disturbing or harassing other tenants</li> <li>• Interference with any right, comfort, or convenience of residents or employees</li> <li>• Excessive noise from your apartment</li> <li>• Failure to maintain individual leased space in a clean and sanitary condition</li> <li>• Allowing use of common facilities by nonresident without management consent or presence of approved household member</li> <li>• Installation of appliance (stove, refrigerator, air conditioner, washing machine, locks, etc.) without written consent of Management</li> <li>• Allowing a guest on property without required permission</li> <li>• Failure to allow Landlord or Landlord's Agent to enter the premises</li> <li>• Failure to observe quiet hours</li> <li>• Failure to obey parking regulations at property</li> <li>• Alteration and/or addition to property not authorized by management in writing</li> <li>• Loitering in hallways or common areas</li> <li>• Improper disposal of garbage, trash or other obstructions</li> <li>• Smoking in the building</li> <li>• Poor behavior related to excessive alcohol use</li> <li>• Aggressive or abusive behavior against other residents, staff, guests, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Property Management and Case Management teams will meet to discuss the violation. Case Management team may follow up with the resident to problem solve the issue.</li> <li>• The individual may be issued a verbal or written warning, depending on severity</li> <li>• Behavioral Health supports may be offered</li> <li>• <b>Four</b> minor lease violations in 12 months may result in lease termination</li> </ul>



# Palmer Court – Permanent Supportive Housing EXPECTATION PROTOCOLS

<p><b>B) Substantial Lease Violation:</b></p> <ul style="list-style-type: none"> <li>• Severe house rule violation</li> <li>• Possible call to police</li> <li>• Immediate action required by Property Management in serving written notice</li> </ul>	<ul style="list-style-type: none"> <li>• Possession of drugs or drug paraphernalia</li> <li>• Excessive short-term traffic of individuals to the unit</li> <li>• Damage to property</li> <li>• Disturbing or harassing other tenants</li> <li>• Interference with any right, comfort, or convenience of residents or employees</li> <li>• Excessive noise from your apartment</li> <li>• Failure to maintain individual leased space in a clean and sanitary condition</li> <li>• Allowing use of common facilities by nonresident without management consent or presence of approved household member</li> <li>• Installation of appliance (stove, refrigerator, air conditioner, washing machine, locks, etc.) without written consent of Management</li> <li>• Allowing a guest on property without required permission</li> <li>• Failure to allow Landlord or Landlord's Agent to enter the premises</li> <li>• Failure to observe quiet hours</li> <li>• Failure to obey parking regulations at property</li> <li>• Alteration and/or addition to property not authorized by management in writing</li> <li>• Loitering in hallways or common areas</li> <li>• Improper disposal of garbage, trash or other obstructions</li> <li>• Smoking in the building</li> <li>• Poor behavior related to excessive alcohol use</li> <li>• Aggressive or abusive behavior against other residents, staff, guests, etc.</li> <li>• Extreme or ongoing damage to property</li> <li>• Extreme behaviors that threaten that interferes with the rights of other residents to peacefully and properly enjoy their apartments</li> </ul>	<ul style="list-style-type: none"> <li>• Police may be called if necessary.</li> <li>• Property Management and Case Management teams will meet to discuss the violation. Case Management team will follow up with the resident to problem solve the issue.</li> <li>• The individual will be issued a written Notice of Violation.</li> <li>• Behavior contract may be put in place</li> <li>• Behavioral Health supports may be offered</li> <li>• DCFS call in cases of child endangerment</li> <li>• If the violation is in relation to possession of drugs or drug paraphernalia, Property Management will engage in follow-up inspections. Case Management will engage in Harm Reduction strategies and support and encourage treatment options.</li> <li>• <b>One or more</b> substantial lease violations in 12 months may result in lease termination.</li> </ul>
<p><b>C) 3 Day to Comply with Lease or Vacate:</b></p> <ul style="list-style-type: none"> <li>• Severe house rule violation</li> <li>• Likely required call to police</li> <li>• Immediate action required by Property Management in serving written notice</li> </ul>	<ul style="list-style-type: none"> <li>• Possession of drugs</li> <li>• Excessive short-term traffic of individuals to the unit</li> <li>• Poor behavior related to excessive alcohol use</li> <li>• Violent, aggressive or abusive behavior against other residents, staff, guests, etc.</li> <li>• Extreme or ongoing damage to property</li> <li>• Hoarding that has not been resolved by the resident</li> <li>• Pest infestation that the resident is either contributing to or refuses to resolve</li> <li>• Extreme or ongoing damage to property</li> <li>• Extreme behaviors that threaten that interferes with the rights of other residents to peacefully and properly enjoy their apartments</li> </ul>	<ul style="list-style-type: none"> <li>• Police may be called if necessary.</li> <li>• Property Management and Case Management teams will meet to discuss the violation. Case Management team will follow up with the resident to problem solve the issue.</li> <li>• The individual will be issued a written Notice of Violation</li> <li>• Behavior contract may be put in place</li> <li>• Behavioral Health supports will be offered</li> <li>• DCFS call in cases of child endangerment</li> <li>• If the violation is in relation to possession of drugs or drug paraphernalia, Property Management will engage in follow-up inspections. Case Management will engage in Harm Reduction strategies and support and</li> </ul>



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		<ul style="list-style-type: none"> <li>encourage treatment options.</li> <li><b>Failure to comply</b> may result in lease termination</li> </ul>
<p><b>D) 3 Day Nuisance Notice – Lease Termination:</b></p> <ul style="list-style-type: none"> <li>Severe house rule violation</li> <li>Likely required call to police</li> <li>Immediate action required by Property Management in serving written notice</li> </ul>	<ul style="list-style-type: none"> <li>Possession of drugs - intent to distribute, determined by police</li> <li>Threat with a weapon or use of a weapon</li> <li>Violent assault of a resident, staff, guest, etc.</li> <li>Extreme or ongoing damage to property</li> <li>Extreme behaviors that threaten that interferes with the rights of other residents to peacefully and properly enjoy their apartments</li> </ul>	<ul style="list-style-type: none"> <li>Police may be called if necessary.</li> <li>Property Management and Case Management teams will meet to discuss the violation. Case Management team will follow up with the resident to discuss housing plan and next steps (return to shelter, other housing, etc).</li> <li>The individual will be issued a written Notice of Violation.</li> <li>Behavior contract may be put in place to prevent return to homelessness.</li> </ul>