

Housing Development and Operations Division:

22 North Re-stabilization Plan

Overview

22 North is an affordable permanent supportive housing project located in downtown Bellingham, WA this is owned and operated by Opportunity Council. There has been a recent increase in community concern regarding criminal related activity that threatens the health and safety of residents, staff, and community members at large. The escalation of concern has triggered an in depth assessment of the stability and management of 22 North and its ability to continue to perform to standard as a community asset. The project's current status is out of compliance with community stakeholders and investors.

Impacting factors that were identified as contributing to programmatic as well as operating instability include:

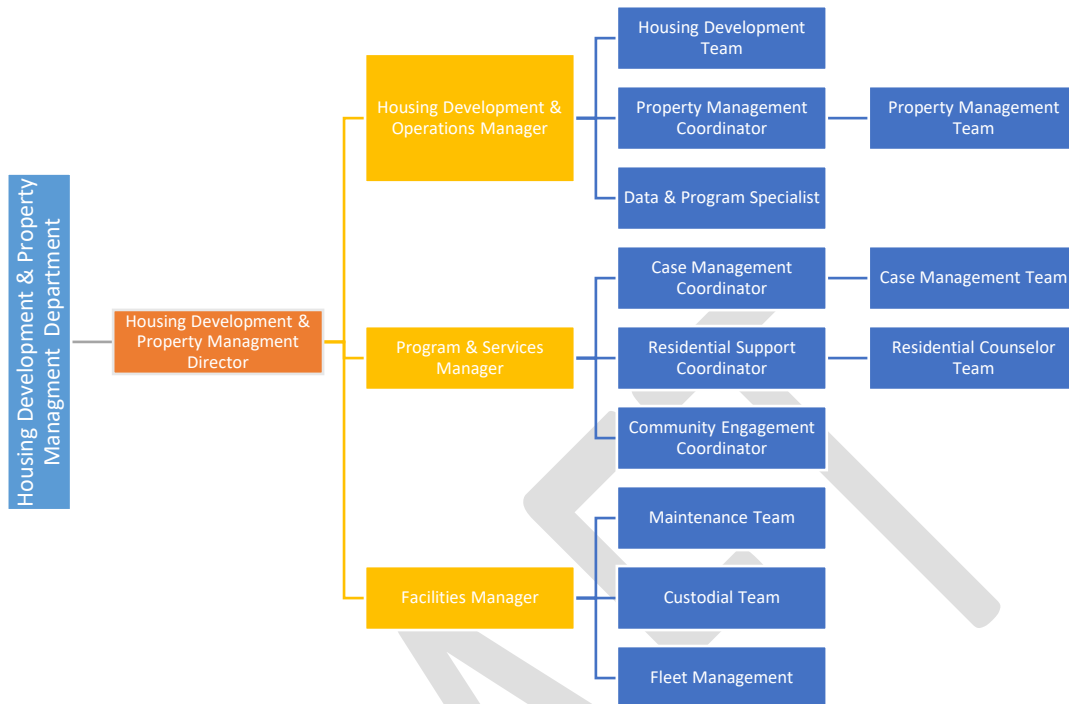
- The WA State Eviction Moratorium's prompt and prolonged restriction on lease enforcement and unit access
- Workforce turnover, shortage, and performance restrictions impacted by COVID
- The increase in criminal related activity in the community at large
- Changes in criminal-legal system laws and Bellingham Police Department workforce shortages, which reduced capacity to respond to suspected criminal activity
- A dissonance between operating partner agencies on the methodologies and evidenced based practices of operating a Housing First modeled permanent supportive housing program

The Housing Development and Operations Division of Opportunity Council has prepared the following re-stabilization plan to address these items of concern and develop a formative path forward towards compliance.

Operations, Management, and Programming Restructure

The Housing Development and Property Management Department has instituted a new restructuring that more clearly defines the roles and responsibilities between the operations management and services of 22 North and its residents. In addition to the restructure two new positions will be introduced that will assist in with compliance, performance improvement, and community engagement. These new positions include a Data and Programs Specialist and Community Engagement Coordinator.

Department Restructure Model



The Housing Development and Operation Division under the new restructure model will embrace the agency's mission of creating and maintaining quality affordable housing projects throughout our communities. The staff in this division will operate our facilities through the lens of asset management while maintaining supportive collaboration with housing service providers.

Staff Retention and Training

Prioritizing staff safety in conjunction with enhancing work performance confidence will have a great impact on staff retention. This can be achieved by broadening training methods as well as providing greater access to permanent supportive housing (PSH) property management resources. One method of achieving this goal will be to connect staff with partner agencies in surrounding areas who are also operating PSH programs to provide mentorship and guidance on best practices. Community Frameworks, our partner consultant, has offered to provide mentorship in this area that will include site visits to other PSH programs in the Snohomish and King county areas.

Some areas of training focus will include:

- Methods for compliance management
- Navigating lease enforcement and fair housing
- Active shooter violence
- Crisis prevention response methods for de-escalation

- Best practices for mitigating substance use in housing
- Demonstrating community stewardship
- Promoting professional boundaries
- Determining self-care and building resilience

In addition to helping staff feel better equipped with knowledge and resources, it is equally important to foster staff morale. Management will play a closer role in boosting staff confidence and holding a sense of ownership of their programs. This will include weekly team meetings to focus on property performance improvement and will provide the opportunity for collaborative problem solving, peer support, and debriefing. Staff will also have an opportunity to find ways to celebrate tenant successes to help extend a positive morale to their communities.

22 North Property Management Plan Revisions

The following are immediate changes to be introduced and enforced in the new 22 North Property Management Plan are detailed below:

- Updated Applicant Criteria
- Revised lease enforcement policies
- New guest policy and restricted visitor access
- Building remediation plan

Applicant Criteria

The following tenant screening criteria will replace our previous criteria which previously only screened for Level III sex offenders and methamphetamine production.

- New applicants will be denied if their criminal history includes any of the following:
 - Arson
 - Reckless Burning Charges
 - Assault with a deadly weapon
 - Weapons charges (unlawful firearms, possession of a dangerous weapon, unlawful possession of a firearm, carrying a concealed firearm)
 - Assault levels 1-3

Tenants will retain the opportunity to appeal their denial and may be approved with the inclusion of a Housing Safety Plan.

Revised Lease Enforcement Policy

These guidelines are to be implemented immediately:

- Lease enforcement notices will be posted without consultation of services staff.

- Housing Retention Review Panel that was reviewing all eviction notices has been disbanded as of 5/16/21.
 - Mutual terminations will still be an option for residents facing eviction to keep evictions off their record and to have a speedier exit.
- Updated lease enforcement procedure policy will focus on tightening up timelines for behaviors to be resolved.
 - Removing warning letters as an interim step before 10 days
 - Suspending the option of legal stipulations for stopping a 3-day nuisance from proceeding to eviction
 - Shortening the timeline for housing retention plans for residents to respond to 10 day comply or vacate notices. Housing retention plan must be in place at the end of the 10-day compliance period. Moved the length of time for a housing retention plan from 90 day to a maximum 30 days to improve behavior or another 10 day will be issued.
- Enforce current lease uniformly and consistently. Areas of emphasis will include:
 - 10 day comply or vacate
 - Letting guests in without checking them in through guest approval process
 - Guest behavior that is violation of lease but not criminal activity
 - Poor unit sanitation
 - Smoking inside (legal substances) or candles
 - 3 day nuisance waste
 - Criminal activity by resident or their guests
 - Illegal substance use in the building
 - Serious damage to building (greater than \$2,500)
 - Violation of No-Weapons Policy with emphasis on firearms

New Guest Policy and Restricted Visitor Access

Guest behavior and visitor access has had a substantial negative impact on the safety and stability of 22 North and surrounding neighbors. Navigating the ongoing issue will require multiple approaches over an extended period of time.

Currently in effect:

- A comprehensive list of trespassed guests has been posted at each entry point and throughout the building.
- Residents who allow trespassed guests into the facility will be issued a 10 Day Notice; four of these notices constitutes ground for a 60 day termination for cause in accordance with RCW 59.20.080

Policy to be implemented immediately:

- Notice to all residents will be posted on 5/23/2022 indicating that all guests will be required to pass the guest screening approval process. The approved guests criteria includes:
 - Photo ID

- Background screening consistent with tenant criteria
- Agreement to the Guest Policy which includes:
 - No weapons allowed on premise
 - No illegal substances allowed onsite
 - No smoking in the building or within 25 feet
 - No damage to tenant units or facility
- Restricting guest entry by turning off automatic fob entry access during building quiet hours: 10PM to 8AM
- Issue 10 day comply notices for violations to current guest policy including:
 - Letting in trespassed guests or guests who have not been approved
 - Letting in guests without checking them in
 - Letting in a guest who then violates the lease in some way

Long Term Changes; these would take 60-180 days to a year to implement

- Explore options to install a 2nd exterior door at the main entrance to slow incoming guest traffic
- Introduce a guest policy that does not allow guests during quiet hours
- Formally revise tenant leases to reflect new guest policy

Benefits compared to a no-guest policy:

- *Do not waste time enforcing a no guest policy for residents whose guests are not causing problems*
 - *Not all residents' guests are destructive but if we have a no guest policy fair housing law requires we enforce it equally. Staff time is a limited resource and we will be wasting some of it by enforcing the no guest rule on residents whose guests are not a problem, instead of being able to focus just on the residents with guests who are causing the biggest problems.*
- *Stronger legal position if we need to go to eviction*
 - *Doesn't require a change of lease so our legal notices are stronger in court since we are enforcing the lease that the residents signed.*
- *Avoids power struggle with residents*
 - *We are enforcing the lease that residents signed – removes the power struggle of residents arguing we are making up new rules, they didn't agree to this at move in, etc.*

Building Remediation Plan

Standard unit inspections and building maintenance was substantially deferred over the course of the 18 month Eviction/COVID Moratorium. In order to get things back on track we plan to implement the following strategies:

Unit Inspections

- All units will be inspected within the next 60 days.

- Units found to not meet sanitation standards, have damages, or demonstrate other lease violations happening in unit will receive 10 day comply notices
- All units receiving 10 days will be inspected 10 days later to check on progress towards improvement.
- Case Managers will be present during unit inspections to mitigate client escalation
- Community events will be coordinated to coincide with mass unit inspections
- After initial inspections, all units will be inspected at least quarterly. At least one of those inspections being a full HQS inspection annually.

Facility Maintenance

Items to be address in the next 90 days:

- Clean walls with TSP, prime with oil-based primer and then paint all hallways.
 - One hallway a month starting with 2nd floor and moving up
- Clean walls with TSP, prime with oil-based primer and paint common area bathrooms.
- Add a second door to 1st floor which will allow residents to enter building but they will have to be buzzed in through second door.
 - 1-6 months depending on vendors, materials etc.
- Add spikes/ barbed wire to fence around parking lot.
 - 1-6 months depending on vendors, materials etc.

Ongoing maintenance:

- Address deferred maintenance with the assistance of a 3rd party vendor
 - New drop ceiling on main floor to allow better access to water intrusion areas
 - Remodel outdoor smoking/bike storage area to enhance safety
- Continue to comply with funder/investor findings as directed
- Review and update capital needs assessment with facilities division

Ongoing Compliance, Accountability, and Reporting

In order to ensure our city and county funders are aware of our continued commitment, the Housing Development and Operations division will continue to demonstrate our ongoing progress with the following methods:

- Weekly reporting of legal notices issued including narrative summary of any substantial highlights
- Monthly reports which will include the following:
 - Copies of legal notices issued
 - Copies of mutual terminations or evictions processed
 - Copies of inspection reports
 - Photos of any maintenance / facilities work done
 - Narrative summary of any substantial highlights
 - Review of re-stabilization plan

Bridging the Methodology Gap

We need to acknowledge there are different methods and best practices for serving youth and adults who have experienced chronic homelessness. This is why PSH experts avoid combining these populations in the single site model. Having two different basis of evidence-based practice results is confusion of behavioral expectations and inconsistencies in service delivery. In order to develop congruency for residents at 22 North, Opportunity Council (OC) and Northwest Youth Services (NWYS) leadership will need to engage in a focused discussion to moderate a path forward that best serves the interests of these populations including current residents. OC and NWYS leadership will be working with our local stakeholders to identify the next steps in these conversations.

DRAFT