



AOG *Living*

INVESTMENTS • CONSTRUCTION • MANAGEMENT

WILLOW CREEK MANAGEMENT & MARKETING PLAN

PREPARED BY:
AOG LIVING



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MANAGEMENT PHILOSOPHY OVERVIEW

AOG Living's management philosophy is centered on the principle that managing a multi-family property is a service business. The delivery of these services is entrusted to our most valuable assets, our employees. Our recruiting efforts help attract the best associates in the multi-family industry. Our benefits program keeps morale high, which results in higher productivity on our owner's assets. Higher morale also translates into lower turnover, which keeps payroll-related processing expenses low. The latest technology (including self-service applications) increases efficiency and enhances our section 3 compliance efforts.

In summary, AOG Living's operating philosophy is to employ and train high-quality management professionals who are clearly focused on the Owner's objective and the Agency's commitment to the clients they serve.

1. ADMINISTRATIVE / GENERAL OFFICE PROCEDURES

1.1 ADMINISTRATIVE OVERSIGHT

Orion recognizes that managing affordable housing communities is challenging, particularly pertaining to social and economic problems of the residents, collection of rents, and proper physical maintenance of the physical plant. In view of these considerations, the following program for the management of these assets has been devised.

1.1.1 DUTIES & RESPONSIBILITIES OF OWNER AND AGENT

The Owner establishes guidelines and delegates to the Management Company (Agent) the authority and responsibility to carry out policies on a daily basis. The On-Site Manager, an employee of the Agent, reports to a Regional Supervisor and is responsible for the daily operations.

The Agent will provide manuals, forms, and operating guidelines for property operations, in compliance with any and all blended occupancy programs applicable to the affordable housing site. This includes operating guidelines for compliance administered by state and local agencies. Training programs will focus on procedures, monitoring and compliance requirements for the applicable affordable programs, on-site computer system operation, use of forms, and skills for property management and maintenance teams. The Agent will review and recommend all on-site rental pricing, fees, deposits, lease terms, etc. and maintain on-site file organization.

The Agent will prepare an annual budget for Owner approval. Monthly operating statements reflecting actual to-budget results will be prepared with a management review and variance narrative report that comments on property operations.

Agent can make decisions or take such actions as may be necessary to comply promptly with any and all governmental orders or other requirements affecting the property, whether imposed by federal, state, county, or municipal authority, subject to the limitation of items such as recurring expenses within limits of the budget or emergency repairs involving danger to

persons or property; and entering into contracts for water, electricity, gas, sewage, pest control, decorating, and laundry room facilities.

The agent is also responsible for the disbursement or transfer of certain funds from the rental account, the adoption of an annual budget for the project, and, at the owner's request, retaining a certified public accountant for preparation of the required annual financial reports, and the placement of all insurance policies required to be carried out with respect to the property and its operations.

Such actions as may be necessary to discharge the responsibilities and duties properly delegated to and assumed by the Agent will be described in a Management Agreement to be entered into by and between the Owner and Managing Agent.

In addition, the following responsibilities will be delegated to the managing agent:

- Receive and respond appropriately to resident concerns, complaints, and other communications.
- Overseeing the quality of the physical plant, including dwelling units, community building, office, maintenance storage areas, laundry, recreational areas, and laundries. Inspect and maintain the asset to NSPIRE standards at all times. Prepare for REAC/NSPIRE inspections upon notification if applicable. Prepare vacant/occupied units for HQS annual and move-in inspections.
- Setting up and maintaining applicant files, resident, and unit files.
- Enforcing the lease and the Community House Rules policies, including informal and formal notification of lease or community violations, notice of lease cancellations, lease terminations, and evictions.
- Preparation of documentation and forms necessary to carry out evictions and take eviction cases to court.
- Incident reporting to include casualty losses, accidents, and police reports of crimes, theft, and vandalism.
- Timely correspondence with the Housing Agency Section 8 department regarding vacancies to ensure Section 8 referrals are being received and PBV vacancies are being filled expeditiously.

1.1.2 PERSONNEL MANAGEMENT METHODOLOGY

The policies described below will be in effect, with the exception of sites with "business agreements" in place. At these sites, employees remain employees of the housing authority, however much like contracted employees from temporary agencies, their daily duties are directed by AOG corporate staff members.

- **HIRING STAFF**

The hiring program of the Agent will be conducted in a non-discriminatory manner in conformance with the equal employment opportunity requirements as mandated by the federal government. Decisions on placement and promotion will be made based on merit, qualifications, and ability to perform the required tasks and not by reasons of race, color, creed, natural origin, or disability.

All personnel - professional, maintenance and clerical - shall be hired without regard to race, color, sex, age, religion, national origin, disability, sexual orientation or familial status according to Title VII of the Civil Rights Act of 1964, Title VI of the Civil Rights Act of 1964, Section 109 of Title I Housing & Community Development Act of 1974, Age Discrimination Act of 1975, as amended, Section 504 of the Rehabilitation Act of 1973, as amended, Title VIII of the Civil Rights Act of 1968, Executive Order 11063 and any other applicable Equal Opportunity requirements of Federal, State and local laws.

AOG Living continuously searches out “Best Industry Practices” and techniques to attract qualified applicants. Employee sourcing includes the utilization of employee recruitment sites such as Indeed, Monster, Career Builders, local apartment associations, the Orion website, employee referrals, and Section 3 recruitment if applicable. Vacant positions are advertised in a standard manner through these sources, and the “equal employment opportunity” citation is displayed prominently in all advertisements. If a resident indicates an interest in employment when there is a staff vacancy, and he or she lacks specific qualifications, the agent will assist the resident in obtaining sufficient training to qualify.

It is AOG Living’s general policy that each employee will be required to meet the AOG Living guidelines for their particular job description, and all employees will be asked to submit to the normal hiring procedures of the company, including background, criminal, and drug test. All costs associated with the hiring of site employees will be directly charged back to the site.

- **STAFF TRAINING**

At AOG Living, we believe that by supporting, investing, and encouraging our employees to pursue industry education and designations it will translate into the successful professional management of our client’s assets.

AOG Living provides all properties with web-based operations manuals and a hard-bound accounting manual. These manuals are easily accessible to all employees as these manuals can be viewed online via the AOG Living website. An eight-chapter Policies and Procedures Manual offers information on everything from leasing techniques to legal issues to office and resident operations to personnel matters.

- The RESMAN Computer Manual provides instruction on any computer-related work, such as rental income, move-outs, and other leasing and rent issues.
- The AOG Living compliance portal offers online affordable housing training and real-time interaction with corporate staff for all affordable programs administered by AOG.

- The Tax Credit Manual provides an overview of tax credit compliance and AOG Living policies regarding the Section 42 program.
- The Project-Based Section 8 manual details guidelines for compliance with the HUD model lease and outlines compliance with other layered affordable programs on PBRA sites.
- The maintenance manual provides guidelines for site maintenance operations to include preventative, site, building, unit, common area, and building systems maintenance. Maintenance shop organization, unit turn-over procedures, safety procedures, materials purchasing, and repair bid procurement are also detailed in the manual.
- The Rent & Income Workbook provides instructions on how to calculate tenant annual income, adjusted income, deductions and allowances, and total tenant payments.
- The Accident Prevention Plan Handbook provides safety guidelines for a wide range of topics, from safe back/lifting procedures to personal protective equipment. This handbook is part of AOG Living's Safety Awareness Guidelines.
- Finally, the Employee Handbook supplies new and current employees with information regarding AOG Living benefits, payroll policies, grievance procedures, office procedures and workplace harassment, just to name a few.

Our associates are also required to attend training classes offered by local monitoring agencies. Topics include basic and advanced levels of compliance and NSPIRE inspection training. With the ongoing evolution of the tax credit program, the resources offered by local agencies are essential for making the most current and accurate information available.

Our Vice-Presidents and Regional Supervisors hold credentials of CPM, HCCP, COS, TCS, PHM, and other advanced certifications through courses offered by industry partners such as IREM, Nan McKay, NCHM, SAHMA, NAHB, and local monitoring agencies. Site team members are also encouraged to pursue industry affordable housing designations.

Web-based training offered through Grace Hill/Elizabeth Moreland will present a broad range of compliance-related topics, including Fair Housing and ADA requirements. The training features videos, reference manuals, and final exams for which an associate may earn certificates upon successful completion. AOG Living also offers additional classroom and in-house webinar, and teleconference training courses.

1.1.3 RETENTION

Upon satisfactory completion of the hiring process, each employee will attend web-based Orientation Training on the property, which will encompass all of the details of employment as well as important company policies and procedures. Each employee will begin their tenure with AOG Living by completing a 30-day evaluation period, during which time they are encouraged to ask questions and request feedback from their supervisors. AOG Living Maintenance Supervisors will assist by reviewing Maintenance staff performances as well as interviewing prospective staff members to fill available staff positions. If it is determined that an employee will not or does not wish to meet the criteria required by AOG Living, their position will be

filled with a candidate who meets the job description requirements. All employee wages will be paid in compliance with Federal Wage and Hour Laws to include Davis Bacon wage requirements if so required.

1.1.4 STAFF BENEFITS AND POLICIES

Benefits are explained in the Human Resources/Payroll section of the AOG Living Policy & Procedures Manual. They include paydays, vacation time, commissions and bonuses, educational, employee apartments, Safety program, employee recognition, employee performance, and employee counseling.

1.1.5 STAFF GRIEVANCE PROCEDURES

AOG Living employee grievance procedures are stated in the AOG Living Employee Handbook and include the proper procedures and timelines for filing complaints.

1.1.6 STAFF TERMINATIONS

Termination of employment policies are addressed in the AOG Living Employee Handbook and include termination procedures, vacation/sick pay for terminating employees, employee debt obligations at the time of termination, and unemployment insurance.

1.1.7 LINES OF AUTHORITY WITHIN THE MANAGEMENT COMPANY

The lines of authority, responsibility, and accountability within the Management Company flow from the President to the Vice-President of Housing Operations and Compliance or the Area Vice President and then to the Regional/ District Supervisory level personnel down to the On-Site Managers. Each On-Site Manager is under the direct supervision of the Regional Supervisor, and all on-site staff members are under the direct supervision of the On-Site Manager. All decisions regarding property management personnel policy and condition of employment are made by the Agent.

The Vice-President of Housing Operations and Compliance, the Area Vice President and the Regional Supervisor assigned to the site shall be the key contacts within Orion's organization.

The Regional Supervisor assists the manager in the selection of the on-site staff. This includes approval and advertisement placement of vacant positions. The Regional Supervisor will serve as the daily direct contact for all AOG Living employees. All site directives and communications from Agency Asset Management staff shall flow directly through the Orion Regional Supervisor assigned to the portfolio.

The Regional Supervisor will provide all daily operating directives to the site manager. The site manager is responsible for the day-to-day operations of the asset. This includes but is not limited to, facilitating repair requests, vendor relations, administering the development partnership SOPs, following the approved tenant selection plan, lease enforcement, overseeing collections, and meeting all agency benchmarks such as timely re-certification, the prompt turnover of vacant units, continuing program compliance for all affordable programs, and the daily supervision of all site personnel.

The manager is vested with the authority to make discretionary decisions in the event circumstances occur that are not covered by written instructions or known policies and procedures.

All decisions for major capital repairs are made with the owner's approval and shall follow all procurement processes as specified by the development partnership.

The organizational charts that follow clearly outline Orion's lines of communication and areas of responsibility at both the corporate and site levels.

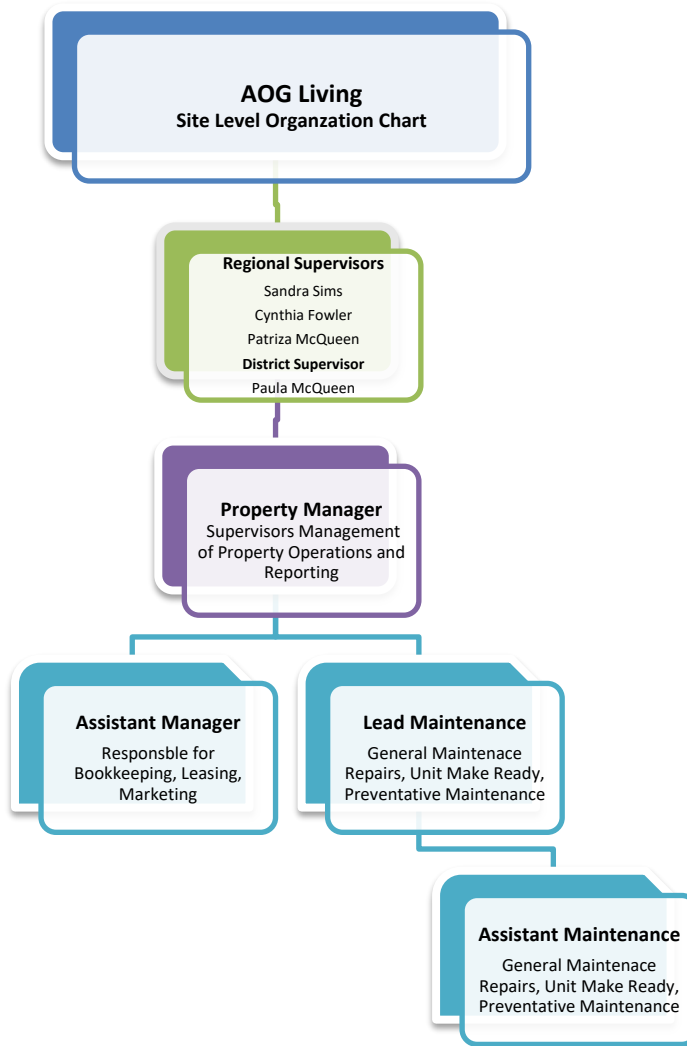
AOG Corporate Organization Chart



Corporate/Site Staffing Plan and Organizational Chart

The AOG Living is able to perform initial eligibility and continued occupancy requirements for blended occupancy sites, to include initial eligibility, recertification of annual income and family composition, and compliance with affordable program requirements. All applicants will be directed to the Public Housing Authority for placement on their Section 8 waitlist. Previous Public Housing waitlist applicants will take preference for placement. In addition to the eligibility and continued occupancy requirements, the AOG Living will maintain the physical assets in compliance with HQS and NSPIRE inspection protocols within established and approved budget guidelines using a combination of approved vendors/contractors and on-site team members.

Regional Supervisor – Executive point of contact and serves as the liaison between the onsite team and the owners. The Regional Supervisor is responsible for meeting investor/owner reporting requirements. The on-site personnel organizational chart is a described below:



The job descriptions for the staff members assigned to sites are attached for review and include the following.

- Property Manager – see job description attached.
- Assistant Manager - see job description attached.
- Leasing Consultant - see attached job description (possibly part-time position)
- Lead Maintenance – see job description attached.
- Assistant Maintenance - see job description attached.
- Make Ready/Porter - see job description attached

The onsite team will be supported by a corporate compliance team responsible for all tax credit and affordable program compliance. AOG Living compliance also supports the sites with an interactive compliance website, which serves as a program compliance resource for all site personnel.

Specific site staffing plans stipulating proposed wages and benefits will submit to our clients upon request.

1.2 TECHNOLOGY

AOG Living policies concerning the use of technology are clearly outlined in AOG's General Office policies. Property computers are to be used by personnel for business purposes only. Further detail regarding the use of technology by AOG Living employees is detailed in the AOG Living Employee Handbook:

Sections included in the handbook are as follows.

- Care of Equipment
- Office Protocol
- Approved Computer Software
- Computer Virus Protection
- Electronic Mail and Voice Mail Monitoring
- Internet Usage and Monitoring
- Acceptable Uses of Electronic Communication
- Social Media

All employees are given the employee handbook on the first day of employment and all details are discussed in Orientation on that day. These policies are designed to outline and limit the use of technology for business purposes only during work hours. Employees are also given access on the first day of employment to all web-based site operation manuals, which further detail AOG Living's policies regarding the maintenance, professional, and proper use of all technology while on the job as well as the possible use and impact of social media upon employment.

The employee handbook outlines employee expectations regarding the proper care of all equipment while at work. Employees are subject to wage deductions for the improper use of equipment, which results in loss or damage to existing equipment. Employees must report any loss or breakage to their direct supervisor immediately.

1.3 HOURS OF OPERATION

The official office business hours observed are Monday-Friday from 8:30 A.M. to 5:30 P.M. Saturdays from 10:00 A.M. to 3:00 P.M depending on occupancy benchmarks. Holidays and office closures shall be determined on an annual basis.

AOG Living site personnel are expected to interact with clients and co-workers with the highest degree of professionalism. This includes providing their availability or providing assistance to our clients during and after office hours if so required by our clients. The Employee Handbook outlines these professional expectations. The company was founded and has operated on the principle of the highest ethical standards in all business relationships. Employees with client contact are expected to promote the Company's best interest and to build customer goodwill with client representatives. Further, Orion recognizes that our employees' conduct on the job, whether done directly for a client, either externally or internally, impacts the quality of our services delivered to our clients.

Therefore, each employee is expected to do the highest quality and quantity of work every day. Employees are encouraged to create professional relationships that are genuine. All relationships with co-workers, supervisors, clients, and residents in Orion-managed communities must be "conducted with respect and full integrity". AOG Living's General Office Procedures manual offers further guidance regarding the office appearance and atmosphere to be maintained always. This policy offers details regarding the cleanliness of the offices, curb appeal, file set-ups, and office décor.

1.4 AFTER-HOURS COVERAGE

The Orion Employee Handbook details emergency hour procedures to be observed on all Orion-managed sites. The manager forwards the telephone to the answering service at the close of business each day and confirms the person scheduled for the call that evening. This is the same policy for holidays.

The answering service procedures are detailed in Orion's General Office Procedures. Each property office utilizes an answering service to handle telephone calls during non-business hours and while office staff persons are temporarily out of the office during normal business hours. The telephones are to be taken off of the answering service, and messages are retrieved no later than the start of business each day.

The answering service is aware of the following:

1. Office hours, address, and fax number
2. Which office and maintenance staff persons are on call at all times
3. Maintenance requests that constitute an emergency
4. Regarding emergency procedures.
5. Changes in staff, including names and telephone numbers

Regardless of who is on-call, the Regional and property managers are to be contacted immediately if the emergency involves a flood, fire, death, or other catastrophic situation.

The AOG Living Employee Handbook describes Emergency Call Procedures to be followed on AOG Living-managed sites at all times. This also includes after-hour lockouts. Any emergency after-hour calls must be responded to within ten minutes by telephone. Once the call is determined to be an emergency, employees must respond in person within 30 minutes. All employees are required to have working cell phones at all times. Failure to comply with emergency call procedures may result in disciplinary action up to and including termination.

The answering service is instructed to inform residents to contact the police in case of an emergency.

1.5 FILE RETENTION

1.5.1 Tax Credit Sites

In addition, at tax credit sites, the following policies regarding tax credit files will be followed:

- **Thorough and Organized Documentation**

All resident certification documentation and re-certification materials will be kept on file at the on-site office. According to “Best Practices” by state monitoring agencies and Orion policy requirements, the on-site manager will be responsible for maintaining the applications and all other relevant verifications and records for all applicable affordable programs. All move-ins, recertifications, and transfers will be reviewed and approved by AOG Living’s Tax Credit Compliance department before move-in to ensure that applicants and transferring residents meet eligible qualifying Section 42 program guidelines. Tax credit re-certifications and AEC documents will also be reviewed annually by the corporate tax credit monitors to ensure continuing program compliance. AOG Living’s Housing Compliance Director and housing compliance monitors will review other applicable compliance documents to ensure compliance with the HCV, HOME, and Bond programs if applicable.

- **Timely and Accurate Record Keeping**

AOG Living has developed a resident file format to help maintain the comprehensive records required to comply with all affordable programs. Each resident file is set up and maintained in this manner to present information to the auditors in a satisfactory and logical manner. Site visits are conducted by the regional supervisor, and resident files are selected at random and audited for ongoing compliance and organization. Detailed reports are provided monthly for cross-reference capabilities. Compliance reports are reviewed on a monthly basis by Regional Supervisors. All resident lease files are maintained on the site. Specific instructions regarding the maintenance of tax credit first-year files are contained within the Orion Tax Credit Manual. A digital copy of all first-year files is maintained in a site-secured drop box, and a copy is uploaded to the syndicator upon request.

1.6 CONFIDENTIALITY

Orion's policies regarding confidential information maintenance are detailed in the General Office procedures handbook. Orion follows all federal and state laws regarding the protection of confidential information. File storage and disposal policies, as outlined in HUD EIV Compliance requirements, are strictly adhered to. Applicants' and residents' personal information is to be used for business purposes only and as it relates to their leasing an apartment home or residency. Only authorized employees of AOG Living will have access to applicant or resident information. The site personnel will keep documents and electronic records belonging to applicants and residents in secure areas. This information is always maintained behind two locked doors and electronic password protected. AOG Living employees, law enforcement officials, and signed contracts with collection agencies are considered authorized persons.

Release of Information and Media Comment instructions to employees are further discussed in AOG Living's General Office Procedures Manual. These policies detail the release of information directives and directions to be followed regarding media comments to be provided should media inquiries present themselves. As directed by the Development Partnership, all media comments will be redirected to the appropriate person identified by the Partnership for this role. This Development partner representative's information will be given to media outlets should the situation arise at any of the managed sites.

1.7 BULLETIN BOARDS/RESIDENT INFORMATION CENTERS

Bulletin boards will be established at each site in each office which detail resident information, including the tenant selection plan, resident maintenance charges, sample lease agreements, house rules, grievance policies, office hours, utility allowances, emergency contact information, fair housing, and equal opportunity posters, and language requirements.

In addition, websites will be established for each site, with all the info included on the resident bulletin boards in the office displayed on these websites. Posters will be placed in the leasing offices, providing residents with easy access to information about employment opportunities available on AOG Living-managed sites. Employment applications can be accessed via a cell phone QR code application and displayed on posters, which direct the employment applications directly to AOG Living.

1.8 KEY CONTROL

AOG Living's key control policy is outlined in Orion's Maintenance Manual. This includes locating the key box behind two locked doors. A key control log is maintained, and all keys must be checked out and recorded on the log. The on-call person is the only person with keys to the lockbox after hours. Residents must provide written authorization to enter the form before their key can be given to a non-resident.

The policy further details policies regarding temporary personnel, non-access, lockouts, master keys, key control log details, and the key control box details, such as the key coding system. All sites establish a key code system with the details of that system maintained in a different location in the office. All keys must be returned to the key box by the end of the day.

If the site budget allows, it is recommended that an electronic key control system such as Key Tracs be purchased to further track and document electronically all access to occupied units. All units are to be individually keyed and **not mastered** due to the risk and liability issues involved with the use of master keys.

1.9 ACCESSIBILITY

1.9.1 Fair Housing/Civil Rights Compliance/Affirmative Fair Housing

AOG Living is committed to the objective of providing housing to all eligible applicants regardless of race, color, religion, sex, familial status, handicap, or national origin. (Age may be an eligibility factor in projects designated for elderly occupancy.) All management personnel are reminded of the provisions of Title VIII of the Civil Rights Act of 1968 and its amendments to provide fair housing opportunities to all persons. Specific actions that are prohibited include:

- Refusing to rent a particular dwelling because of race, color, religion, sex age (if a factor), familial status, handicap, disability, or national origin.
- Directing or “steering” persons only to specific areas.
- Requiring applicants to meet different terms or conditions of occupancy that differ from the property rental criteria.
- Including language in advertising showing a preference for specific applicants against the provisions of Title VIII of the Civil Rights Act of 1968 and its amendments.

Each management employee, including maintenance staff, receives instruction pertaining to the provisions of the Federal, State, and local Civil Rights laws. All employees are required to take five hours of Grace Hill Fair Housing training annually pursuant to continuing employment requirements.

An affirmative fair housing marketing plan will be in effect for the managed site, which will involve publicizing the availability of housing opportunities to all persons regardless of race, color, religion, sex, disability, familial status, national origin, and any other factors based on state and local laws, in the media most likely to be used by the applicants, including minority publications or other minority outlets that are available in the housing market area. Advertising will target groups other than the typical population of the neighborhood in which the property is located, reaching out to applicants who are least likely to apply because they are not the predominant racial or ethnic group in the neighborhood.

In addition, an Equal Housing Opportunity poster with a logo will be prominently displayed all in the leasing offices. The Equal Housing Opportunity logo, slogan, or statement will also appear on all advertising, including web sites, signs, brochures, flyers, and publicity materials.

1.9.2 SECTION 504 COMPLIANCE

AOG Living is committed to complying with Section 504 of the Rehabilitation Act by ensuring our policies and practices do not deny individuals with disabilities the opportunity to participate in or benefit from housing services or programs. When an individual with a disability requests an accommodation or modification, on-site management will fulfill these requests, unless doing so will result in a fundamental alteration in the nature of the program or create an undue financial and administrative burden. In such a case, if possible onsite management will offer an alternative solution that would not result in a financial or administrative burden. AOG Living's Regional Supervisor ensures all properties.

- Operate housing that is not segregated based upon disability or type of disability unless authorized by federal statute or executive order;
- Provide auxiliary aids and services necessary for effective communication with persons with disabilities;
- Develop a transition plan to ensure that structural changes are properly implemented to meet program accessibility requirements and
- Perform a self-evaluation of the property's program and policies to ensure that they do not discriminate based on disability.
- Operate the program in the most integrated setting appropriate to the needs of qualified individuals with disabilities.

1.9.3 REASONABLE ACCOMMODATIONS

AOG Living, in accordance with the Fair Housing Act and Section 504 of the Rehabilitation Act, will make reasonable accommodations or modifications for individuals with disabilities (applicants or residents) unless the modifications would change the fundamental nature of the housing program or result in undue financial and administrative burden.

Onsite management will inform all applicants/residents that, at any time, the applicant/resident or a person acting on behalf of the applicant/resident may make a request for reasonable accommodation or modification for an individual with a disability.

If an applicant or tenant indicates that an exception, change or adjustment to a program service, building, or dwelling unit is needed because of a disability, management staff will treat the information as a request for a reasonable accommodation, even if no formal request is made.

If the need for the accommodation is not readily apparent or known to management staff, the family must explain the relationship between the requested accommodation and the disability. There must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability.

All reasonable accommodation requests will be remitted to the Regional Supervisor for review and approval upon submission by a resident.

Before providing an accommodation, management staff must determine that the person meets the definition of a person with a disability and that the accommodation will enhance the family's equal access to and enjoyment of the property. Third-party verification must be obtained from an individual identified by the family who is competent to make the determination. A doctor or other medical professional, a nonmedical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability.

Management staff must keep in mind if a person's disability is obvious or otherwise known to property staff, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required.

The Regional Supervisor will provide an initial reply to requests as quickly as possible but no more than ten (10) business days from the receipt of the request unless the owner/ agent explains the delay. The response may include but is not limited to:

- Request Approval
- Request Denial
- Request for Additional Information or Verification of Need

The Regional Supervisor will consent to or deny the request as quickly as possible. Unless the owner/agent explains the delay, the applicant/resident will be notified of the decision to consent or deny within no more than thirty (30) calendar days after receiving all necessary information and documentation from the resident and/or appropriate verification sources. All decisions to grant or deny reasonable accommodations will be communicated in writing or, if required/requested, in an alternative format. Exceptions to the thirty (30) day period for notification of the owner/agent's decision on the request will be provided to the resident setting forth the reasons for the delay.

If the request for reasonable accommodation or modification is denied, the requestor has the right to appeal the decision within fifteen (15) business days of the date of the written notification of denial. The appeal meeting will be conducted by a person who was not originally involved in the decision to deny.

1.10 ANNUAL INVENTORY

An inventory of all fixed assets will be executed annually, and a written record will be maintained and provided to the Development Partner in an electronic format upon request. The inventory will include all owned or leased office equipment, furniture, décor, and maintenance equipment. The inventory shall be reviewed by the manager and Regional Supervisor before submission to the Development Partner to verify the accuracy of the materials inventoried for the site. The inventory shall contain accurate details, including serial/model numbers and estimated replacement values. Any damaged or stolen fixed assets or equipment must be noted and removed from the inventory list at the time of the loss.

1.11 FINANCIAL RECORD KEEPING

The Regional Supervisors for the sites will conduct monthly manager meetings to review monthly financial statements and variances with the managers. The monthly manager's meetings are also utilized to discuss Development Partner Directives related to monthly and financial reporting requirements required. Annual budget meetings will be conducted to train the managers to coordinate the compilation of the annual operating budgets for the Development Partner.

Managers are also encouraged to pursue additional industry designations, such as their CAM (CERTIFIED APARTMENT MANAGER) through the local apartment association, and affordable designations, such as the TCS designation through NCHM.

Orion's Accounting Manual, General Operations, and Resman Manual are other tools utilized to train the manager and on-site personnel. The training manuals are accessed by Orion personnel via the AOG Living website. The manuals train the personnel on Orion policies regarding rent collections, bank deposits, the handling of delinquent rent, purchasing restrictions, and the processing of site payables.

Record keeping and Audit- Bank account information, financial statements, and accounts payable are maintained by the corporate office. Each property has a separate bank account. All interest earned on these monies remains in that account. The firm used to prepare the annual audit is not affiliated with this property. All bank accounts are reconciled monthly. The project chart of accounts utilized will be the AOG Living's chart of accounts for the tax credit conventional sites.

Payables and Receipts - All resident ledgers are maintained in a computerized format on the site operations system. Resident payments are posted to the system daily upon collection. Invoices for property purchases are entered at the site level into the accounting system, Nexus which is web-based, where they are approved for payment by the manager. The Regional Supervisor then approves them in the system before they are accessed by accounting for payment. The invoices are then processed for payment. All utility billing is received at the Houston AOG Living corporate office with the exception of vacant electricity billing which is forwarded to the site for verification before bills are entered for payment.

Resident Utility Billing – ConService Synergy - ConService will obtain, process, audit, and pay your provider invoices. And can also take care of the entire bill-back process on your behalf, including answering billing-related resident phone calls.

Automated PO and Payment Processing – Nexus Connect - Direct Vendor Pay - Accounts Payable System and PO System. Expense control via online vendor ordering systems.

2.0 MANAGEMENT OPERATIONS / LEASING

The Regional Supervisor will provide all daily operating directives to the site manager. The site manager is responsible for the day-to-day operations of the asset. This includes but is not limited to, facilitating repair requests, vendor relations, administering operational SOPS, following the approved Rental Criteria/Tenant Selection policies, lease enforcement, overseeing collections, and meeting all the Development Partnership benchmarks such as timely re-certifications, prompt turnover of vacant units, continuing program compliance for all affordable programs, and the daily supervision of all site personnel.

The hiring program of the Managing Agent will be conducted in a non-discriminatory manner in conformance with the equal employment opportunity requirements as mandated by the federal government. Decisions on placement and promotion will be made on the basis of merit, qualifications, and ability to perform the required tasks and not by reasons of race, color, creed, natural origin, or disability.

All personnel - professional, maintenance, and clerical - shall be hired without regard to race, color, sex, age, religion, national origin, disability, sexual orientation or familial status according to Title VII of the Civil Rights Act of 1964, Title VI of the Civil Rights Act of 1964, Section 109 of Title I-Housing & Community Development Act of 1974, Age Discrimination Act of 1975, as amended, Section 504 of the Rehabilitation Act of 1973, as amended, Title VIII of the Civil Rights Act of 1968, Executive Order 11063 and any other applicable Equal Opportunity requirements of Federal, State and local laws.

AOG Living continuously searches out “Best Industry Practices” and techniques to attract qualified applicants. Employee sourcing includes the utilization of employee recruitment sites such as Indeed, Monster, Career Builders, local apartment associations, the AOG Living website, employee referrals, and Section 3 recruitment at the site. Vacant positions are advertised in a standard manner through these sources, and the “equal employment opportunity” citation is displayed prominently in all advertisements. If a resident indicates an interest in employment when there is a staff vacancy, and he or she lacks specific qualifications, the agent will assist the resident in obtaining sufficient training to qualify.

2.1 Professional Development Schedule

All employees receive on-the-job training starting on the first day of work. A one-day orientation course is held to familiarize new employees with AOG Living policies and fair housing. During the first 12 months of employment, new hires receive continuing education from AOG Living and reputable training firms, such as Nan McKay, NCHM, Elizabeth Moreland, and Grace Hill. Most training courses will be conducted online, while others will be held in classroom settings both on- and off-site.

Courses will allow the employee to achieve proficiency in the following areas:

1. Management Operations
2. Fair Housing
3. Tax Credit Compliance (as applicable)
4. Marketing and Leasing
5. Project-Based Section 8 (as applicable)
6. Customer Service (See Next Page)
7. RAD Designation Training through NAHRO-either PBRA or PBV

Grace Hill Courses include the following:

Course Phase	Course Title	Course Length	Who Should Take It?	Company
The Essentials	Advanced Closing Techniques	1.5 Hours	Onsite Mgmt. & Leasing	Grace Hill
The Essentials	Advanced Leasing	2 Hours	Onsite Mgmt. & Leasing	Grace Hill
The Essentials	Advance Telephone Techniques	2 Hour	Onsite Mgmt. & Leasing	Grace Hill
The Essentials	Business Ethics	1 Hour	All Onsite Members	Grace Hill
The Essentials	Business Etiquette	1 Hour	All Onsite Members	Grace Hill
The Essentials	Conflict Resolution	2 Hours	All Onsite Members and Supervisors	Grace Hill
The Essentials	COVID-19 Series includes: Basic Prevention, Cleaning Guidelines, Coronavirus and Affordable Housing: HUD Guidance, Handling Service Request Safely During COVID-19 and more.	15-30 Minutes	All Onsite Members and Supervisors	Grace Hill
The Essentials	Creative Marketing Promotions	1 Hour	All Onsite Members	Grace Hill
The Essentials	Crisis Management	1 Hour	All Onsite Members and Corporate	Grace Hill
The Essentials	Curb Appeal	1 Hour	All Onsite Members	Grace Hill
The Essentials	Customer Relationship Management	2 hours	All Onsite Members	Grace Hill
The Essentials	Customer Services Series (1-4)	30min – 2 hours	All Onsite Members	Grace Hill
The Essentials	Dealing with Difficult People	1 hour	All Onsite Members	Grace Hill
The Essentials	Drug-Free Workplace	1 hour	All Onsite Members	Grace Hill
The Essentials	Diversity and Inclusion	1 Hour	All Onsite Members/Corporate	Grace Hill
The Essentials	Fair Housing (TDHCA & DPOR Approved)	2 Hours	All Onsite Members	Grace Hill
The Essentials	Fair Housing II	2 Hours	All Onsite Members	Grace Hill
The Essentials	Fair Housing for Maintenance	1 Hour	All Onsite Members	Grace Hill
The Essentials	Follow-Up Techniques	1 Hour	All Onsite Members	Grace Hill
The Essentials	Maintenance Courses includes Golf Cart Safety, EP Section 608,	30min – 1 Hour	All Maintenance Members	Grace Hill

	Ladder Safety, Make Ready Maintenance, R-410A Intro, Swimming Pool Maintenance			
The Essentials	Leasing Series 1 – 4	30min	All Management and Leasing Members	Grace Hill
The Essentials	Resident Retention	1.5 Hours	All Onsite Members	Grace Hill
The Essentials	Sexual Harassment	1.25 Hours	All Onsite Members	Grace Hill
The Essentials	Stress Management	1 Hour	All Onsite Members	Grace Hill
The Essentials	Time Management	1 Hour	All Onsite Members	Grace Hill
The Essentials	Workplace Harassment	1 Hour	All Onsite Members	Grace Hill
Compliance Plus	Assistance Animals in Multifamily Housing	15 min	All Onsite Members	Grace Hill
Compliance Plus	Fair Housing and Limited English Proficiency	15 min	All Onsite Members	Grace Hill
Compliance Plus	Fair Housing and Local Nuisance Ordinances	30 min	All Onsite Members	Grace Hill
Compliance Plus	Fair Housing and social media	f15 min	All Onsite Members	Grace Hill
Compliance Plus	Fair Housing and the Violence Against Women Act	15 min	All Onsite Members	Grace Hill
Compliance Plus	Retaliation in the Workplace	20 min	All Onsite Members	Grace Hill
Elective	Basic Maintenance Series	2 Hours	All Maintenance Members	
Elective	Cybersecurity Series	20 min	All Onsite Members	Grace Hill
Elective	Leadership Development Series	15 min	All Onsite Members	Grace Hill
Elective	Tax Credit Essentials	20-40 min	All Onsite Members	Grace Hill
	Tax Credit Training	8-24 hours	All Office Personnel	TDHCA NCHM

2.2 RENT COLLECTION

2.2.1 Rent Collection Policies and Procedures

Both the Owner and Agent realize that rent payment difficulties may occur and must be anticipated and dealt with. AOG Living recognizes that RAD Conversions of Public Housing Properties must comply with HUD-required grievance procedures as the affordable program dictates, however, these grievances shall not include non-payment of rent issues. Partial payments are generally discouraged. Re-Payment plans will not be considered with the exception of EIV fraud issues. All repayment agreements must be in writing and signed by both parties. Residents are advised about due dates for their rent upon move-in. Rents are collected at the on-site leasing offices.

- Rent is due and payable on the first day of each month. It is considered late and subject to a late charge in accordance with the adopted Residential Lease. Late charges will be assessed and collected as dictated in the Residential lease in order to discourage future late payments. Additionally, late rent payments will be accepted only in the form of a cashier's check or money order. No cash will be accepted. If rent is paid with a personal check and the check is returned for insufficient funds, this shall be considered non-payment of rent and incur the late charge plus an additional NSF fee assessed by the banking institution. All returned checks must be replaced with certified funds.
- All collections will be deposited daily into the rental management account established for the property operations. The bank account maintained for this purpose would be separate if so, directed by the Development Partner, from all other accounts and will be established in a bank whose deposits are insured by the Federal Deposit Insurance Corporation (FDIC).
- A rent payment portal will be established on the property website for the convenience of the residents.
- Delinquent rent charges will not be waived without explicit approval or instructions from the Owner.
- Delinquent rent reports will be monitored weekly by the Regional Supervisor to ensure compliance and the meeting of the Development Partner's benchmarks of 98% collections monthly.
- The Regional Supervisor will review the delinquent/prepaid reports with the manager weekly to determine and approve the appropriate rent collection efforts to be taken to include the filing of evictions and writs for non-payment of rent.

2.3 UTILITY ALLOWANCES

Utility Allowance guidance is provided by AOG Living in the Affordable Housing Manual available via the web for staff reference and queries from residents regarding their utility allowances assessed. The maximum allowable rents are dictated by state monitoring agencies and are based on a particular area's median income as determined annually by HUD. In addition to rent, a Utility Allowance ("UA") is taken into consideration. UAs are the average utility costs for water, gas, and electricity consumption for a particular region. UAs are calculated either by Rural Housing Services, HUD, Public Housing Authorities, written local estimates, HUD's model schedule, energy consumption model, or an actual use method/agency estimate. The UA is subtracted from the gross rent for all utility costs paid by the resident. If the owner pays all expenses, there is no UA.

All UAs are reviewed quarterly by the Regional Supervisor after local agencies are contacted concerning any UA updates to monitor possible UA changes. AOG Living policies include the UA applications for several affordable housing programs to include tax credit and HOME funds, Section 8 voucher, and Public Housing subsidies. UA usage is also covered in the manual guidance.

In addition, guidance is offered for Hybrid Utility Allowances or allowances based on utility estimates from the local utility company. This method must be reviewed annually, with a new study conducted each year. The utility allowance methodology must be approved by the state compliance agency.

Staff training for the implementation of annual utility adjustments in the Operating Systems will be provided by the AOG Living Regional Managers as required. Utility allowances and descriptions of methodology will be published on the property's community website for resident reference.

2.4 GENERAL/LEASING MANAGEMENT FUNCTIONS

2.4.1 Tenant Management & Accounting Software

2.4.1.1 Third Party Partners

SOFTWARE	PLATFORM OF SERVICES	COMMENTS
Answering Service/Task Mgmt Platform	SightPlan	Increases productivity, risk management, and improves the return on investment with a tool that enhances relationships between management, maintenance teams, and the community.
Automated PO and Payment Processing	Nexus Connect	Direct Vendor Pay - Accounts Payable System and PO System. Expense control via online vendor ordering systems.
Business Intelligence	RealPage BI	Allows our operators and clients to look at their portfolio's performance in one system in lieu of having to use multiple reports within the PMS system.

Collections	ProCollect	Higher than expected returns, state of the art software and skip tracing, allows us the ability to track and recover your accounts at more than double the national average.
CRM	Anyone Home	Attract, Convert, & Retain – Anyone Home CRM provides the workflow tools and insights needed to improve outcomes at every stage and increase NOI directly through the Resman platform.
ID Verification	RightID/First Advantage	Reduces rental fraud, improves tour safety, and captures real-time marketing data.
Property Management System	ResMan	Resident portal, work orders, online leasing, real-time availability, lead management, accounting, and reporting. We would use our ResMan platform for day-to-day operations and could import financial data on a monthly basis to your preferred accounting software. This is the current process for other clients.
Renter's Insurance	ePremium	Specializes in renters' insurance for multifamily and single-family rental properties. Offering policies that provide coverage enhancements designed specifically for renters, as well as deposit alternatives.
Resident Payment	Resman Payments (Aptexx)	Online payment through the ResMan resident portal. ResMan Payments also provides a resident survey tool free of cost. The following surveys are set up – general satisfaction, prospects, move- ins, renewals, move-outs, and completed service requests.
Resident Utility Billing	ConService + Synergy	ConService will obtain, process, audit, and pay your provider invoices. And can also take care of the entire bill-back process on your behalf, including answering billing-related resident phone calls.
Resident Screening	First Advantage	Proprietary databases, regularly updated public sources, and expert customer service. A leading choice for mitigating risk while remaining compliant with applicable laws. Includes fraud protection.
Revenue Management	LRO	Once stabilized we would recommend using a Revenue Management System for dynamic reference rent calculation to consider competitor pricing, exposure, leasing velocity, supply, and demand, when calculating pricing and optimal lease terms.

2.4.1.2 Training/Oversight of Staff

New employee staff training on the Resman and third-party operating systems utilized by the site will be provided by senior staffers, Orion Regional Supervisors and AOG's systems trainer. This training will consist of the posting of rents in the system, work orders, move-ins/move-outs, and the assessment of resident charges and damages. Management staff will be required to possess a level of knowledge before assuming rental-related duties such as certifications, re-certifications, rent or occupancy charges, and recordkeeping.

The On-going training in compliance for the property staff will include regularly attendance of LIHTC, HUD workshops, and various online training sessions sponsored by HUD, TDHCA, NAHRO, NCHM, Grace Hill/Elizabeth Moreland, and NOVOGRADAC, to ensure the properties are in compliance with all current regulatory regulations and laws. Management and staff are trained to be proficient in the performance of their duties and responsibilities in order to carry out project objectives in compliance with applicable federal, state, and local laws. All costs associated with training on-site employees will be a project expense.

2.4.1.3 Rental Criteria/Tenant Selection Plan

The Tenant Selection Plan is a truncated version of the previous ACOP (Admission Policies) utilized by Housing Agencies and it includes IRS Section 42 requirements. The plan will include both project eligibility and specific requirements.

See Exhibit 2-Sample Rental Criteria/Tenant Selection Plan

2.4.1.4 Lease/House Rules

The HUD Model Lease will be utilized on the RAD PBRA sites/units and the National Apartment Association lease will be utilized on PBV properties/units. However, the RAD Rider will be utilized with both leases. The goal of the Housing and Community rules during the conversion is to keep the residents rights and participation requirements consistent with HUD requirements. The RAD rider protects and ensures issues surrounding a resident's right of return, and other lease holder issues such as termination of tenancy, security deposits, grievance policies, and rent collection/notice terms.

See Exhibit 2 – House Rules

2.4.1.5 Move-In Process

The management staff will review the lease and all lease addendums with the head of household, and if possible, with all household members to ensure that they understand the lease at move in. VAWA protections, and the community policies/house rules are reviewed with the new resident, as well as pet policies and any other affordable housing addendums. During this briefing, as each document is reviewed, the management staff will obtain all signatures and dates required on the documents, including management signatures and dates. The resident will be provided the following:

- The lease
- All lease addendums
- Residents' rights and responsibilities
- EIV & You Brochure if applicable
- Lead Paint disclosure form

When the briefing is concluded, the management staff will collect the security deposit, the pro-rated first month's rent, and the pet deposit if applicable.

LIHTC Sites - The Affordable Housing Addendum is an addendum to the lease contract. It stipulates the Affordable Program's requirements for residency. All LIHTC properties must use this addendum at move-in and again annually. It provides an avenue for eviction if the unit does not comply with the requirements of the Section 42 LIHTC program.

RAD Conversion Sites - Additional resident addendums are required to satisfy HUD requirements. The RAD addendum will be utilized on all RAD units at conversion.

2.4.1.6 Resident Charges/Rent Billing

Resident ledgers will be reviewed monthly by the Managers and Assistant Managers to determine accuracy. Resident damage charges will be posted on the property website and on the bulletin boards in the administrative offices.

2.4.1.7 Lease Renewals/Recertifications

Annual re-certifications must be completed by the resident's recertification anniversary date, and their information must be uploaded via the monitoring agency's website. This is also important in order to remain in continuing program compliance with LIHTC and other affordable programs at blended occupancy sites.

The site staff will inform residents, through written notices, about the resident's responsibility to provide information about changes in family income or composition necessary to complete an annual recertification. These notices will include information on the recertification process, requirements, and timelines.

- **Initial Notice:** Upon initial certification at move-in, residents are informed about their responsibility to report familial and income changes. At each annual recertification, residents are issued first reminder notices 120 days in advance of the resident's annual re-certification date. The first reminder notice will include the requirements in the residential lease regarding the resident's responsibility to re-certify annually. A copy of the notice will be retained in the resident's file, documenting the date the notice was issued.
- **Second Reminder Notice:** If the Resident fails to respond within 30 days of the first reminder notice, a second reminder notice will be sent 90 days prior to the resident's recertification anniversary date informing the resident that his/her recertification is due, the notice will provide the resident with all of the information issued in the first reminder notice. This notice will also be retained in the resident's file.
- **Third Reminder Notice:** If the resident does not respond to the Second Reminder Notice before 60 days prior to the recertification anniversary date, the staff will provide the resident with a Third Reminder Notice no later than 60 days prior to the anniversary date. This notice will also serve as a 60-day notice to terminate assistance and a 60-day rent increase notice. A copy of this notice will be maintained in the

resident file, documenting the date the notice was issued.

- Tax Credit Sites: Annually on the anniversary date of the LIHTC household's move-in or initial designation, staff members will collect and maintain current data on each LIHTC household including number of household members, age, ethnicity, race, disability status, rental amounts, and rental assistance.
- In addition, at LIHTC sites, staff members will collect and maintain current student status data for each LIHTC household on student eligibility forms as required by the Section 42 program.

2.4.1.8 Termination of the Lease

Any termination of the lease must be carried out in accordance with HUD regulations and the terms of the lease. This includes:

- Resident notice to end tenancy with 30 day written notice presented by the resident.
- Tenant's material non-compliance with the terms of the agreement.
- Drug related criminal activity engaged on or near the premises by the tenant, household member, or guest.
- Tenant's material failure to carry out obligations under any State landlord and Tenant Act.
- Determination by management that a household member is illegally using a drug or that a pattern of drug use is interfering with the health, safety, or right to peaceful enjoyment of the premises by other residents.
- Criminal activity by the resident, guest, or a member of the tenant's household.
- Management may terminate the lease for any good cause, which includes, but is not limited to, the tenant's refusal to accept changes to the agreement. Terminations for "other good cause" may only be effective as of the end of any initial or successive term.
- Material non-compliance with the lease includes one or more substantial violations of the lease, repeated minor violations of the lease, disrupt the livability of the property, adversely impacts the health and safety of other residents, or the failure to timely supply all the required information on family income and composition, or eligibility factors of the tenant household, or failure to sign and submit consent forms for obtaining wage and claim information from state wage collection agencies.
- Non-payment of rent or any other financial obligation due under the lease beyond any grace period permitted.
- All lease terminations require the Regional Supervisor's approval to proceed.

All documentation regarding lease violations shall be documented in the file and electronically in the operations system by the management staff in detail at the time non-compliance occurs. Terminations for cause and written documentation will be remitted to legal representation for review and they will file all “for cause” legal evictions.

All lease terminations for non-payment of rent shall be filed monthly by the site manager upon review and approval by the AOG Living Regional Supervisor.

2.4.1.9 Move out Process

Residents are required to remit a thirty-day written notice pursuant to the lease. A notice describing possible damage charges to be assessed at move out is given to the residents, notifying them about possible charges if they do not return the unit to the same condition as it was rented to them.

Residents will be responsible for returning their unit in the same condition as it was rented to them, less normal wear, and tear. A move-out inspection will be conducted with the resident when keys are returned during normal business hours. Residents will be made aware of damage charges to be assessed on their security deposit statement during the move-out inspection.

A statement of deposit will be issued after the move-out. All statements of deposits and refunds will be mailed out to the resident within 30 days of moving out.

2.4.1.10 Monitoring Unit Turnover

A work order is generated on the day of move-out direct maintenance to proceed with the make-ready turnover of vacated units. It is AOG Living’s goal to maintenance make ready all vacant units within five working days. Unit make-readies are entered into the operations system upon the maintenance turnover of vacant units. The Regional Supervisor and site manager will monitor reports daily to ensure turnover benchmarks are met.

2.4.1.11 Communications

Appropriate communications systems, auxiliary aides, or other assistance, as required by the Americans with Disabilities Act, to the extent appropriate, may be used to ensure effective communication with applicants, residents, and members of the public who have sight or hearing impairments. Such systems or aids may include flashing lights for doorbells and telephone signals, leases and applications in Braille, or other systems and aids which may be required by Federal or State law that do not constitute a financial burden on the property.

Accommodations at resident meetings must be made if requested by residents for hearing impaired residents and for residents presented with language barriers. A translator will be provided upon the request of a resident for scheduled meetings at properties managed by AOG Living.

The property websites will be utilized to provide weekly ongoing communications and information to the residents. The monthly newsletter provided by management will also seek to inform residents about staffing, office closings, scheduled maintenance, inspections, and many more aspects relating to their residency at the multi-family sites managed by AOG Living.

2.5 WAITING LISTS-RAD PBV and PBRA

To ensure that applicants are appropriately and fairly selected for the next available unit at RAD sites, it is essential for AOG Living management to either coordinate with the Agency for voucher referrals or maintain site-based waiting lists in accordance with HUD regulations. If the site is a PBRA RAD Conversion, once a preliminary application is submitted by an applicant and their eligibility is determined, Orion staff will place the applicant's household on the site-based waiting list for which the applicant applied. **Public Housing applicants will be given a preference on the waitlist** if the site is a RAD PBV site, all applicants will be redirected to the Housing Agency for placement on the Section 8 waitlist for voucher referrals to the site. Public Housing Applicants will be granted a preference for placement. The websites for RAD PBV Conversion communities will redirect applicants to the Housing Agency for placement on their Section 8 waitlist.

2.5.1 RAD PBRA Site-Based Waiting Lists

Pre-applications for housing at all AOG Living-managed blended occupancy sites are only accepted at the office locations. All site-based waiting lists will be maintained in accordance with HUD regulations.

Applicants will first complete a pre-application at a chosen site to have their name placed on that site waiting list for housing. The pre-application must be completed in full and submitted before the applicant is placed on the waitlist. All pre-applications must be electronically time and date-stamped by the site staff upon submission by the applicant. **Public Housing applicants from public housing waitlists will be given a placement preference on the PBRA site based wait list.**

Upon receipt of the completed pre-application, the management staff will make a preliminary eligibility determination before adding a household to the waiting list or initiating final eligibility tasks. The staff will review the application to ensure that there are no obvious factors that would make the applicant ineligible for the affordable housing program in place at the site.

If the applicant is determined to be preliminarily ineligible, the staff will notify the applicant by written notice, indicating that they are not eligible, including the reasons why they were determined to be ineligible and stating the family's rights to appeal the decision according to the Grievance and Appeals policies. If an applicant is otherwise eligible, but no appropriate unit size exists in the property, the staff will reject the pre-application.

Due to long waiting lists and depending on the housing preferences for which an applicant's family may qualify, the time spent on the waiting list may be anywhere from several months to several years.

AOG Living will update the site-based waiting list by removing the names of applicants who are no longer interested in or no longer qualify for public assistance. It is recommended that all site-based waiting lists are purged and updated every six months by removing the names of



MANAGEMENT/MARKETING PLAN

applicants who are no longer interested in or no longer qualify for housing assistance. This is

accomplished by the management staff contacting each applicant household by mail, using the address provided on the pre-application. Applicants are responsible for updating their applications with any changes in address. The head of household will be the only person contacted unless otherwise requested.

If this letter is unable to be delivered by the United States Postal Service, the application will be rejected, and the household will be removed from the waiting list. If the head of household (HOH) fails to respond to the management letter inquiries regarding their desire to remain on the waiting list, the application will be rejected, and the household will be removed from the waiting list. In addition, an adult member of the applicant household must contact the site staff in writing if household information changes arise such as number of household members, criminal history, income, etc. If the household size or composition changes, AOG Living staff will update the waiting list information and decide whether the household needs the same or a different unit size. If, as a result of the household composition change, it is determined that the household will be on the waiting list for a different unit than originally indicated, the household will maintain their place on the waiting list for the new unit. If the waiting list is currently closed for the appropriate unit size, the application will be rejected, and the household will be removed from the waiting list. If there are no units of the appropriate size on the property, the household will be rejected and will be removed from the waiting list.

When the applicant family reaches the top of the waiting list, they will receive a formal notification by mail to come to an eligibility interview where they will fill out a formal application for admission to the site. If a family does not attend the scheduled appointment, a notice will be sent to the family and their name will be withdrawn from the waiting list. If the family responds within fifteen calendar days of the notice and requests to be rescheduled, they will be placed back on the waiting list with their same date and time. Once the family misses their third scheduled appointment, they are no longer eligible to be placed back on the waiting list. The family will be required to submit a new application and start the process from the beginning.

During the eligibility interview process, the applicant's family will complete a full, formal application. All adult applicants will be required to complete the application package as instructed.

2.5.2 Agency Wait List Procedures – RAD PBV Conversions of Public Housing Units

The site-based wait list is centralized and managed by the housing agency, AOG Living staff will submit file requests to the Agency for applicant files to fill site unit vacancies from the centralized wait lists maintained by the Agency for the site. Applicant files not responding to requests for application interviews will be returned back to the Agency pursuant to centralized wait list requirements as established by the agency issuing the project-based vouchers.

The websites for RAD PBV Conversion communities will redirect applicants to the Housing Agency for placement on their Section 8 waitlist. **Public Housing applicants will be given a preference on the PBV waitlists.**

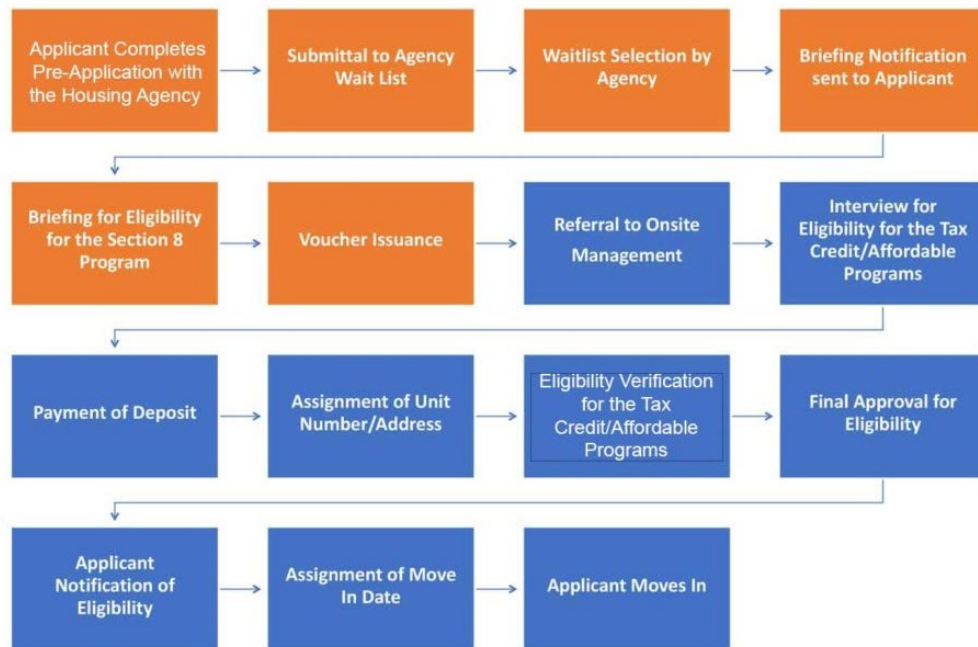
Waitlist procedures for the sites will be discussed in detail in the Section 8 administrative plan previously presented to HUD when the RAD conversion for the agency's public housing units was approved. AOG Living will follow closely and adhere to all predetermined and approved wait list procedures as established by the partner agency.

2.5.3 Application Life Cycle - PBV

The chart and instructions below are included on the property websites offering clear instructions to applicants on how to apply at these affordable communities.

Applicant processing for occupancy at PBV sites shall flow as follows:

The Application Life Cycle



Legend

	Agency Application Process (Issues the voucher and sends the referral to the site staff.)
	Site Management Application Process (Site management verifies eligibility for the other affordable programs and occupancy)

Applying for residency at Oak Grove is a two-step process involving interaction with the Housing Authority and the AOG Living as the site managers. The Housing Authority issues rental assistance in the form of project-based vouchers, and the management group verifies eligibility for occupancy and the other affordable programs in place. The process begins as follows below:

1. Applicant Completes Pre-Application with the Housing Agency

Clicking on the link below will take you to the agency website, where you will complete a pre-application that will be reviewed by agency staff. You will then be added to the site-based wait list.

2. Submittal to Agency Wait List

The pre-application will be reviewed by agency staff. Please complete the pre-application in its entirety. The pre-application when completed, will be uploaded to the site-based wait list.

3. Waitlist Selection by Agency

Applicants are pulled from the site waitlist and sent notifications for formal briefings.

4. Briefing Notification Sent to Applicant

The notification will include what documents and materials you will need to bring to your scheduled briefing in order to complete the formal application for a Section 8 voucher. However, there will be additional materials and the apartment deposit that will be required on that day to complete your interview/application with the site management staff.

5. Briefing for Eligibility for The Section 8 Program

The Housing Authority will meet with you during a briefing to discuss your eligibility for the Section 8 program. All documents requested by the Section 8 department in their correspondence must be presented at that time by the applicant for verification for eligibility.

6. Voucher Issuance

The Section 8 voucher is issued after eligibility for the program is confirmed.

7. Referral to Onsite Management

Once the agency has confirmed eligibility and the voucher is issued, you will be re-directed and referred by the Housing Authority to the property administrative office to complete an application for occupancy at the site and eligibility for the other affordable programs that are in place at Oak Grove. AOG Living staff members will be on hand to assist you with any questions that you might have during the application process.

8. Interview for Eligibility for The Tax Credit/Affordable Programs

Applicants will meet with site staff at the actual property administrative office. A "What You Will Need List" of documents is attached below. You will need to present all the requested documents during your interview and complete an application for admittance to the site and the other affordable programs in place which includes, a background/criminal check.

9. Payment of Deposit

Payment of the deposit will be required on the day of your interview and they are as follows by bedroom size.

10. Assignment of Unit Number/Address

A unit number/address will be assigned on the day of the interview.

11. Eligibility Verification for The Tax Credit/Affordable Programs

Eligibility will be determined based on the application that you complete and the documents that you present during your interview.

12. Final Approval for Eligibility

Third-party verification will be required, so it might take several days for completion by the site staff. Your file is also reviewed by AOG Living corporate staff to ensure eligibility for the affordable programs.

13. Applicant Notification of Eligibility

The AOG Living site staff will notify you in writing and possibly by telephone that your eligibility for occupancy at Oak Grove has been confirmed or denied.

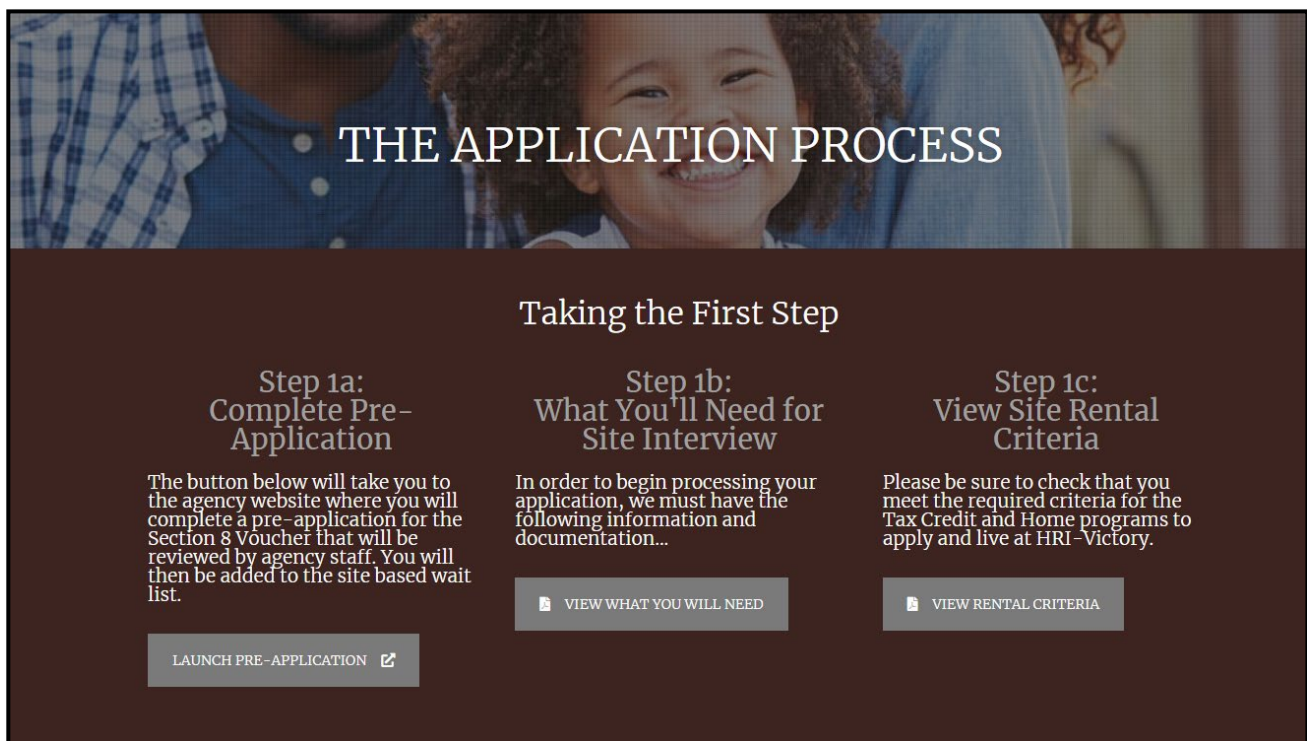
14. Assignment of Move-in Date

The site staff will confirm your move-in date and assist you with any questions you might have concerning your move, utility connections, etc.

15. Applicant Moves In

The site staff walks your apartment on the move-in date, assuring move-in readiness. The lease, addendums, and supporting lease documents are signed and completed with the site staff. Keys are issued. Pro-rated rent, if due, is paid, and the site staff will walk your new apartment with you to ensure your satisfaction with your new home.

The property website links to the Housing Agency Portal for applicants so they can apply for residency in the Section 8 Program and be added to their waitlist.



THE APPLICATION PROCESS

Taking the First Step

**Step 1a:
Complete Pre-Application**

The button below will take you to the agency website where you will complete a pre-application for the Section 8 Voucher that will be reviewed by agency staff. You will then be added to the site based wait list.

[LAUNCH PRE-APPLICATION](#)

**Step 1b:
What You'll Need for Site Interview**

In order to begin processing your application, we must have the following information and documentation...

[VIEW WHAT YOU WILL NEED](#)

**Step 1c:
View Site Rental Criteria**

Please be sure to check that you meet the required criteria for the Tax Credit and Home programs to apply and live at HRI-Victory.

[VIEW RENTAL CRITERIA](#)

3. AFFORDABLE PROGRAM COMPLIANCE OPERATIONS

3.1 PROGRAM COMPLIANCE

The value of professional and knowledgeable management is demonstrated when dealing with the many compliance requirements of any affordable program. As a managing agent, AOG Living will comply with all the requirements of the Section 42 affordable housing program as well as other blended affordable programs including HOME, Bond, Section 811, and PBRA. The AOG Living Corporate compliance staff is comprised of a group of affordable housing compliance industry professionals with nationally recognized affordable housing compliance designations and certifications. This corporate support team ensures our affordable multi-family clients and site teams receive the following:

- Exceptional compliance support
- Reliable results
- Continual compliance monitoring
- State audit assistance
- Regulatory guidance
- Accurate Compliance reporting
- Manuals and forms
- Spot site audits/File reviews/Pre-audits before monitoring agency audits.
- 24/7 E-file access
- Regulatory document review
- Rental Criteria/Tenant selection plan, Utility allowance, Rent Schedule, Income limit, and Affirmative marketing plan review.
- On-going monitoring of a vast variety of blended occupancy programs

Our corporate compliance team is comprised of highly trained professionals with nationally recognized designations to include, CPM (Certified Property Manager), HCCP (Housing Credit Certified Professional), TCS (Tax Credit Specialist), COS (Certified Occupancy Specialist), COSP (Certified Occupancy Specialist-Public Housing), and PHM (Public Housing Manager). These individuals have combined industry experience totaling over 150 years. The corporate management team obtained their RAD designations in 2018 from NAHRO- for the CRPBV designation.

3.2 THOROUGH AND ORGANIZED DOCUMENTATION

All resident certification documentation and re-certification materials will be kept on file at the on-site office. According to AOG Living policy requirements, the on-site manager will be responsible for maintaining the applications and all other relevant verifications and records for all applicable affordable programs. All move-ins, and transfers, and transfers will be reviewed and approved by AOG Living's Tax Credit Compliance department before move-in to ensure that applicants and transferring residents meet eligible qualifying Section 42 program guidelines. AOG Living's E-FIT proprietary electronic file system will be utilized to review files by the compliance specialists ensuring the swift turnaround of compliance files for new construction lease-up sites. Tax credit re-certifications and AEC documents will also be reviewed annually by the corporate tax credit monitors to ensure continuing program compliance. AOG Living's Compliance Supervisors and Compliance specialists will review other applicable compliance documents to ensure compliance with the HCV, HOME, PBRA, Section 811 and Bond programs if applicable.

3.3 AOG LIVING'S FILE REVIEW PROCESSES

The Section 42 and project based rental assistance communities under our management currently The affordable communities under AOG Living management are utilizing the ResMan Affordable Platform as the file review system. ResMan Affordable is an internet-based software that allows quick communication and file review between the communities and AOG Living corporate Compliance Specialists.

AOG Living utilizes the ResMan affordable housing software for electronic file submission and review by the Compliance Specialists. The ResMan software is purpose-built to minimize errors and streamline compliance operations. The software provides a central hub that gives AOG Living compliance team and site staff a tool to view a property's compliance status at-a-glance. Additionally, the ResMan software provides other tools for HUD compliance to include special claims and HUD Certification validation.

The ResMan affordable platform includes everything you need to manage HUD, Tax Credit and Rural Development properties all in one platform – from screening to leasing, payments, accounting, maintenance and of course compliance. This platform reduces the risk and enables them to work more efficiently with time-saving features and innovative monitoring and alerting capabilities such as:

COMPLIANCE CENTER – As the command center of ResMan Affordable, this dashboard ensures you know where you stand with compliance. It highlights activities requiring attention, alerts you to everything coming due and lets you dive right in to accomplish the tasks at hand.

ONLINE LEASING AND ELECTRONIC DOCUMENT STORAGE – This fully compliant solution allows you to complete applications and store an unlimited number of documents electronically – increasing efficiency while reducing cost and risk.

CUSTOMIZABLE AFFORDABLE WAITLIST – This feature removes complexity by automatically determining waitlist position when you configure settings and preferences to align with your tenant selection plan.

AUTOMATION WHERE YOU NEED IT – When automating tedious and predictable activities like updating income limits and sending annual recertification notices and EIV reminders, you free up time and resources while removing the risk of human error.



3.4 AOG LIVING AFFORDABLE HOUSING COMPLIANCE PORTAL

The AOG Living's In-House compliance department has developed a website with virtual training and resources for our on-site property staff to utilize at their convenience. Under this portal, there are downloadable Affordable Guidebooks, Manuals, Compliance training guidance, physical inspections training, compliance videos, and Live Zoom training. There are downloadable forms for several affordable housing programs to include LIHTC, Project Based Section 8, BOND, HOME, RAD, CDBG, and Public Housing. Each Property can access their property folder via Dropbox. Files pertaining to each property are uploaded to the dropbox for easy access by the property site staffs, supervisor, and owner/agency.

3.5 TIMELY AND ACCURATE RECORD KEEPING

AOG Living has developed a resident file format to help maintain the comprehensive records required to comply with all affordable programs. Each resident file is set up and maintained in this manner to present information to the auditors in a satisfactory and logical manner. Site visits are conducted by the Regional Supervisor and resident files are selected at random and audited for on-going compliance and organization. Detailed reports are provided on a monthly basis for cross-reference capabilities. File Compliance reports are reviewed on a monthly basis by Regional Supervisors with their site staffs. All resident lease files are maintained on the site. Property compliance documents are maintained within a site property drop box established for each affordable site. Specific instruction regarding the maintenance of tax credit first-year files are contained within the Orion tax credit manual and on the AOG Living website, under compliance. A digital copy of the first-year files will be maintained in the digital property dropbox assigned to the site. In addition, if requested, the first-year files will be uploaded to a syndicator dropbox for review.

4.0 MAINTENANCE OPERATIONS

4.1 MAINTENANCE STAFFING

AOG Living expects maintenance personnel to adhere to the highest possible standards of professionalism. Service requests by residents and specific requests by owners must be handled in a courteous, timely, and professional manner. This professional standard must embody the Orion "motto" "whatever it takes" attitude. Orion managed sites are staffed with a lead maintenance person, assistant maintenance personnel, make ready maintenance, housekeepers, and porters. The size of the staff usually depends on the size, age, and condition of the property.

4.2 MAINTENANCE PLAN AND STANDARDS

4.2.1 Maintenance Program

The AOG Living maintenance program includes three phases. They are scheduled preventative maintenance, the periodic inspection of all units, buildings, and common areas, and work order requests for residents for services. Our maintenance program has an emphasis on the immediate repair of inoperative equipment and damaged property and sets a standard, which can contribute to pride in the community and to a reduction in vandalism.

4.3 PREVENTATIVE MAINTENANCE

A schedule of inspection and maintenance of major items will be established for the property employees in accordance with the manufacturer's manual for installed equipment. Service calls and billings in connection with the repair or replacement of appliances and mechanical equipment will be made in accordance with existing warranties in order to minimize operating expenses and replacement costs.

Repairs will be based to a large extent on the periodic inspection of individual units and the property facilities. A colored label system will be implemented to track the inspection/ replacement of air filters and smoke alarm batteries quarterly. These labels will be initialed by maintenance personnel as preventative maintenance is performed in the individual units each quarter.

- **Energy Efficiency Preventative Maintenance-** Each unit will be inspected periodically to ensure that proper insulation, weather stripping and caulking has been utilized in construction. Where this is found to be inadequate, the deficiencies will be corrected. Project maintenance staff will be carefully trained to periodically attend to such potentially energy-conserving routines as changing filters quarterly in air conditioners and cleaning lint traps in clothes dryers. The Manager shall encourage residents to report leaking faucets immediately. Water heaters will not be set at a temperature higher than is necessary to accommodate resident's needs.
- **Unit Interiors -** A decorating schedule will be established anticipating interior painting of apartments once every five years assuming normal wear and tear. Carpets will be cleaned annually as the budget allows.
- **Building Exteriors-** Exterior painting (wood trim and roof over-hang) will be done as frequently as climatic conditions dictate since it is necessary to present an attractive appearance in order for the property to present an attractive appearance while remaining competitive in the market. Exterior Painting is usually required every 5-7 years.
- **Preventative Maintenance Label Program**
Beginning in July 2023, there will be no more UPCS/HQS inspections, and the new NSPIRE protocol will be implemented. This new inspection protocol will shift the emphasis from unit exteriors to unit interiors, prioritizing health, safety, and functional defects over appearance, a risk-based approach. The NSPIRE model supports the adoption of sound, year-round maintenance practices and will involve more resident input.

The inspection software developed by the AOG Compliance Department allows us to document any problems in the units, exterior and common areas that do not meet the standards of NPSIRE, UPCS, and HQS Inspections. We can generate reports for each property, showing all major/major problems, and administrative issues, such as blocked exits, pest control, flammable materials, and housekeeping issues, and an estimated cost analysis for occupied and vacant units.

An AOG "Best Practice" recommendation to maintain units in good condition includes the use of colored labels placed inside a kitchen cabinet that notes the date of each annual NSPIRE, housekeeping, and preventative maintenance inspection. These colored labels are installed in the interior of each unit in January and the colors change annually so that with a quick glance, a Regional Supervisor can observe that the label program has been implemented.

The label system ensures that all units have been inspected as scheduled and that staff team members have initialed that the annual inspections have been completed. See the label example below.



The image shows three overlapping inspection forms. The first form, titled '2023 PREVENTATIVE MAINTENANCE', lists various maintenance tasks such as 'First Quarter', 'Second Quarter', 'Third Quarter', and 'Fourth Quarter' with fields for 'Date' and 'Initials'. The second form, titled '2023 HOUSEKEEPING INSPECTION', includes sections for 'Annual Inspection' and 'Semi-Annual Inspection', each with fields for 'Inspected By', 'Date', and 'Re-Inspected By'. The third form, titled '2023 NSPIRE INSPECTIONS', has fields for 'Inspected By', 'Date', 'Re-Inspected By', and 'Date'.

- SEE EXHIBIT 3 – PREVENTATIVE MAINTENANCE PLAN

4.4 SITE INSPECTIONS

Frequent inspections of the common areas, parking lots, landscaping and apartments will ensure proper cleanliness and maintenance. Daily inspections will be performed by site personnel pursuant to AOG Living policies for daily site maintenance inspections. The Orion maintenance manual describes the policies regarding daily curb appeal maintenance. Common areas such as hallways, porches, sidewalks, and parking areas are to be walked and swept clean daily. Community spaces to include laundry rooms, parking spaces, fenced areas and grounds are inspected daily for defects and cleanliness. Graffiti noted on the site on building exterior walls, sidewalks, etc. will be cleaned as soon as possible.

Managers shall walk their sites daily and execute work orders for any required repairs noted during their inspections.

Weekly light checks of all buildings and the site shall be completed by the lead maintenance person. All non-working lights must be repaired immediately. These weekly light checks must be documented in a written format.

Access gates must remain in working order at all times. Logs will be maintained to document scheduled repairs and maintenance of the access gates.

4.5 WORK ORDER REQUESTS

A system of receiving work requests and preparation of the work orders together with a continuous record of maintenance and repairs in each unit will be established. Residents will be encouraged to provide written requests for services; however, a verbal request to the office will receive the same prompt service. A follow-up procedure will ensure completed action on each request as well as satisfaction of the resident for the work performed. All requests for repairs will be logged into the electronic operating system that will generate work orders, as appropriate.

Normal service repairs will be performed during regular business hours. Routine work orders will be completed within 72 hours and Emergency work orders within 24 hours. The work order records must be sufficient in both detail and accuracy to determine the average number of hours required to clear emergency and non-emergency work orders. Property maintenance personnel will be given written work orders each morning of jobs which they are qualified and capable of handling; scheduled in order of priority; scheduled in such a manner that time wasted moving from one task to another is minimized.

The On-Site Manager/Lead Maintenance person will review each completed work order and organize any incomplete work for the following morning. Follow-up telephone calls will be made to residents confirming that the work was done to their satisfaction.

All major repairs will be completed by the maintenance staff, whenever possible; if necessary, a specialized technician (plumber, electrician) may be obtained with the approval of the Manager.

A staff person shall be on call twenty-four (24) hours a day, seven (7) days a week in order to handle emergencies which are so serious in nature that they cannot wait to be corrected during regular hours.

Service calls and billings in connection with the repair or replacement of appliances and mechanical equipment will be made in accordance with existing warranties in order to minimize operating expenses and replacement costs.

The Lead Maintenance person shall be responsible for ensuring all work orders are closed in a timely manner and that they are executed completely and in a professional manner. A copy of the services request will be left in the unit identifying the work performed on that day. Delays in repairs will be noted on the work order copy left in the resident's apartment. The work order will identify why the work could not be completed on that day. A maintenance "door tag" is left in the apartment if the maintenance technician cannot complete the work on the first trip. The office will attempt to notify the resident concerning the delay. Upon completion of the work, the service request is updated, and a copy is left in the apartment if the resident is not home when the repairs are completed. If repairs are the result of resident damages, the maintenance person notes this on the work order and the office staff assesses charges in. The resident is then sent a notification of these charges and notes are placed in the System.

Requests for lock changes, exterior door repairs, window repairs, or any other safety issue will be given top priority by the site maintenance personnel. These requests will be addressed promptly before the staff leaves for the day.

4.6 ANNUAL HOME INSPECTIONS

NSPIRE Inspections - A schedule of NSPIRE inspections and maintenance of the units, buildings, common areas, and building systems will be established for property employees so that the sites will be prepared for their NSPIRE inspections by the fall of each year. All three inspectable areas including the building, units, common areas, building systems, and the site will be inspected annually. The building inspections will be completed by September 30th of each year and the number of buildings on the site will be inspected over this nine-month period. The NSPIRE unit inspections will also be split between the first nine months of the year to ensure all units have been inspected before the fall when REAC inspection sweeps begin in preparation of upcoming REACS/NSPIRE or state monitoring agency physical inspections.

All NSPIRE inspections are conducted on site tablets and are uploaded weekly to a drop box that is accessed by the office staff. All inspections are printed and placed in the resident files after work orders are generated in the operations system for repairs noted in the NSPIRE inspections. Staff members also write work orders for pest control for units with pest infestations and schedule housekeeping inspections for units noted to have housekeeping issues.

The label system ensures that all units have been inspected as scheduled and that inspectors have initialed their annual inspections as completed on the labels placed inside the units.

Housekeeping inspections are recommended after 60 days of move-in and then annually at recertification. Housekeeping violations will be documented in resident files and notes placed in the operations system regarding failed inspections. Second re-inspections will be scheduled after one week and lease enforcement will be implemented after a second failed inspection.

4.7 CLEANING AND PREPARING VACANT UNITS

A work order shall be executed for the turn of each unit, which records the day the unit was vacated and the day that the unit turn was completed.

Lock changes are completed on the day of move out and all vacated units are trashed out on the day of move-out. Pest control services are called to spray if required. Painting turnkey contractors are utilized to completely paint the unit and make any necessary Sheetrock repairs, followed by cleaning contractors and then make ready maintenance. Make-ready maintenance includes minor repairs such as there-caulking of tubs, replacement of fixture plates, smoke alarm replacement, etc. A make ready checklist is utilized and signed off by make ready personnel upon the make ready completion of the unit. This checklist form along with the make ready standards and the make ready status log are available in the Orion maintenance manual online in Section 514.01-The Make Ready Process. Window screens are also replaced if required once the make ready is completed.

All unit turns must be completed within 3 working days. No one will be allowed to move into a unit that has not been made ready. All made ready units are walked for final management approval before their completed make ready status is entered into the site operating system.

4.8 INVENTORY AND MATERIAL MANAGEMENT

Maintenance shop organization and cleanliness is fundamental to the success of any type of inventory control. The property manager and the lead maintenance must work together to maintain an organized and proper inventory of parts and supplies because the proper management of parts and supplies is a sign of a well-managed property. Several benefits result from this “teamwork” between management and maintenance:

- Resident satisfaction is higher because repairs are completed in a timely manner when the supplies are “on hand”.
- Cash flow can be maximized because unnecessary dollars will not be spent for unnecessary parts and supplies.
- Re-ordering processes will be easier because shortages or depleted stock levels can be identified at a glance.
- Maintenance staff can make better use of their time by not having to make frequent trips to local vendors or suppliers.

Shelves will be installed in the maintenance shop in an effort to organize parts. The shelves should be color coded by part type such as electrical, plumbing, etc. The amount of inventory maintained on the property will be a sufficient quantity of parts to last 15 days under normal operating circumstances. Bin tag labels showing the quantities on the face of the bin on a bin tag should be established for each bin. Once a part is used, it is entered on the Inventory Control: Parts Used List. This list will serve as a preliminary order form. This list should be kept on a clipboard next to the parts bins. At selected ordering days, the vendors are then shopped, and an order placed. The forms to be used for inventory control can be found on the Orion website.

4.9 MAINTENANCE CONTRACTS

Common sense and a determination of best use of time, money and expertise will dictate the type of repairs that are completed by on-site maintenance personnel and those needing the services of outside contractors.

Contract Evaluations

Written contracts are required for significant capital improvements or items of a recurring nature (landscaping, pest control, etc.). All contracts require a minimum of three (3) bids. Standard contracts are re-bid yearly during budget season. All bids and contracts will be maintained at the property and the regional corporate office. All contracts must stipulate a 30-day cancellation.

Trash disposal will be contracted. Containers will be used for residents to deposit trash in. The contractor will in turn empty these several times weekly. The on-site manager and staff will be responsible for policing the grounds daily to minimize unsightly refuse. The lead maintenance person is responsible for ensuring that the areas around the trash containers are kept in a sanitary condition. Trash containers will be accessible.

Exterminating services shall be contracted monthly or at other intervals as may be appropriate. All units will be treated on a quarterly basis. The grounds will also be treated for ants on a quarterly basis. Additional pet flea treatments will be contracted as necessary. Extermination clean-outs will be scheduled prior to REAC inspections.

Termite renewal contracts will be paid annually if the site is under a termite bond.

Landscape maintenance will be contracted to a professional company qualified to maintain commercial landscaping as well as properly apply necessary chemicals and fertilizers when called for. Seasonal color will be changed on a periodic basis in the beds surrounding the leasing information center to make it bright and attractive, enhancing curb appeal. Grounds upkeep and maintenance will

include the mowing of lawns, trimming of hedges, and fertilization. Property mulch will be replaced property wide on an annual basis. Kiddie mulch will be placed on playground surfaces as needed. Tree trimming will be solicited as necessary annually. Landscape sprinkler systems inspections and maintenance will be added as a part of the scope of services to be provided by the landscape contractor.

Annually, a licensed contractor must inspect all fire suppression systems annually to include sprinklers, fire alarms, and fire extinguishers. Bids will be obtained for review for these services to be provided.

It is recommended that a quarterly preventative elevator maintenance contract be maintained for all sites with elevators to ensure that elevators are kept in excellent running conditions.

4.10 EMERGENCY PREVENTION PLANS

Sections 521, 523, and 524 of the AOG Living maintenance manual available on the AOG Living website provides plans and guidance to site personnel regarding preventative measures to be taken when addressing issues such as mold prevention and clean-up, lead based paint, and asbestos issues. These policies are updated as needed.

4.10.1 AOG Living Emergency Plan - Communicating the Site Emergency Plan

4.10.1.0 Maintain a resident notification list (Update at recertification). Utilize Allied-Orion resident emergency contact update form.

- Name of resident
- Complete apartment address and building location
- Home phone number
- Mobile or cell phone number
- Name of emergency contact person
- Email Address
- Ambulatory movement required?
- Oxygen required?
- Keep residents informed through
 - Meeting
 - Door to door contact
 - Notices
 - Flyers
- Phone calls
- Cell Phone Text Message and email blasts
- Posting messages on boards or resident doors
- Inform residents of local shelters in any crisis event
- Register all elderly and ambulatory residents with 211.

4.10.1.1 Preparing the Property for Emergencies

- Stay informed of pending events, weather warnings, or emergency news reports. Listen to local radio or television for new updates
- Walk the property daily at different times to and note what must be secured or completed
- Protect and secure all files, computers, office equipment and paperwork
- Tape or board up any exposed windows and glass doors
- When required have keys available to the supervisors in the event you cannot return to the property in a crisis
- First aid and medical kits should be available for use at all times
- Recovery tools and equipment should be available after any crisis (such as generators, trash pumps, saws and hand tools)
- Extra food and water for personnel who must work during or after a crisis
- Turn off gas and all-electric utilities before leaving the building or property as required
- Secure all property locations by checking every lock and window
- Secure all potted outdoor plants or trees
- Secure all loose furniture, pool items, playground and outdoor sport equipment
- Leave phone numbers and posted notices for residents and emergency responders as required.
 - At all main office locations
 - Resident counsel offices
 - Main meeting rooms
 - On flyers and notices
- Keep informed about your property before, during and after any major storm or crisis
- Provide a main contact number for personnel to call for information
- Provide contact names and numbers of all company emergency personnel
- Establish an emergency personnel contact phone listing
- Walk the property with staff to check and secure all property locations
- Take pictures before and after any crisis
 - Maintenance equipment and supplies
 - Office equipment and supplies
 - Furniture
 - Computer and electronic equipment
 - All property locations
- Cover and secure all electronic equipment from water, smoke and debris
- Remove all personal items from work sites
- Notify all personnel when to return to work after a crisis (an updated call list is important!)

- Inform your supervisor how to reach you during a crisis
- Return to work as soon as possible to lead and direct your personnel in recovery efforts.

4.10.1.2 Documentation

- Records and files must be maintained to support evacuation and recovery efforts
- Create a file for each issue that happened during a crisis
- Create a file for each separate injury that occurred during a crisis
 - Separate file for residents
 - Separate file for personnel
- Properly maintain all pictures, claims, files, and incident reports
- Maintain separate files for police, fire and medical emergency responding incidents
- DO NOT ALLOW ANYONE to change or alter any files or documents without approval from the supervisor
- When it is received, information may be added but must be noted in the files
- Maintain all files in a safe and secure location
- Be sure all files contain full information and documentation as required
- Keep all receipts for expenses at all times
- Make copies of any files for insurance claims, reports or as instructed

4.10.1.3 10 Critical Steps to Follow During any Emergency, Accident, or Incident

- Notify local authorities and emergency responders
- Notify your supervisor immediately
- Notify the Owner
- Protect your residents as required
- Protect your personnel as required
- Protect your property as needed
- Assist all emergency responders
- Do not talk to the media. That is the duty of the assigned supervisor.
- When help arrives then assist in leading or directing recovery efforts
- Assist residents effected by the crisis
- Note:
 - Properly complete all incident reports
 - Take pictures when possible
 - Return to normal duties as soon as possible

4.10.1.4 Notice of Property Condition Statements

- To be used after the Storm or an Emergency
- If anyone asks questions explain recovery efforts are underway. Be polite and keep conversation to a minimum. Explain you are busy and questions at this

time will hinder any recovery efforts.

- Do not tie up the phone lines with lengthy conversations. Communication is Important

4.10.1.5 What if the Property is affected?

- Immediately contact your supervisor or emergency plan leaders
- Describe the situation in detail after you have personally inspected and verified the situation
- Be sure the property has all utilities working properly before residents and family return
- Lead and direct all recovery efforts under your control
- Secure your property, building or site at all times
- Use a written statement to advise all callers of the conditions of the property
- Do not tie up the phone lines
- Call all emergency contact numbers of residents or staff who have not returned in a timely manner.

4.10.1.6 Crisis Response Plan – Recovery Methods after Storms or Emergency Crisis

- Electric Utilities
- DO NOT TURN ON ANY POWER until a complete inspection is done of all apartments or building locations
- Check for signs of downed power lines or transformers that may sound unusual. If you locate any of these situations do not restore power to the building
- Check for large broken limbs, fallen trees or damaged utility poles
- Check each meter, breaker box and power supply to your building and every apartment.
- Notify the electrician or power company immediately for each building without power.
- Do not allow anyone; maintenance, staff personnel or yourself to attempt any electrical repairs.
- Cut off any breakers to the power supply for any building not operating correctly.
- Wait for an approved licensed electrician or the power company to restore the electricity.

4.10.1.7 Gas Utilities

- Check every location in the buildings or apartments BEFORE restoring any gas supply
- Look for damaged gas meters or a gas smell
 - Gas company adds a 'smell' to be able to detect any leaks
 - Cut off the gas supply valve if possible whenever a leak is detected
- Be sure no one enters the area
- Do not use the phone in the immediate area
- Call a licensed plumber company to complete repairs
- Do not attempt to make any repairs without the proper training or licenses such as
 - Lighting pilot lights
 - Fixing appliances
 - Repairing heaters
 - Repairing stoves

4.10.1.8 Building Damages

- Turn off all gas supply valves to the location
- Turn off all electrical supply panels, disconnects and breakers
- Rope off or tape the damaged building site
- Post signs for No Trespassing and warning signs of dangers
- Board up any damaged windows or doors where required
- Have personnel and staff monitor the locations every morning and check it throughout the day
- Do not allow anyone inside the affected building or apartment without approval from the supervisor.
- Residents, family members or relatives must have the proper permission or authority.
- Monitor all items that may be removed or taken by the residents or others from the building or apartment location

4.10.1.9 Insurance Claims/Incident Reports

Complete an incident report with all the details you can list to help process the accident, claim or incident.

- Time it happened
- Date it happened
- Name of person reporting the accident, claim or incident
- Address of the location of the incident or claim
- Address and phone number of the person reporting the accident, incident or claim

- Property Managers name and cell phone number
- Property address, fax and main phone number
- Description of what and how it happened
- Take pictures where it happened
- Send copies of all reports and pictures by fax or delivery mail service to the Agency's main offices
- Immediately report the situation to the supervisor
- Immediately notify the Agency's Asset and Operations Manager
- Be available to meet with the company personnel, residents and insurance claims personnel at the location or office when required
- Work to complete all the reports to the best of your ability
- The insurance adjuster will notify you of required visits and provide scopes or reports of the damages.

4.10.1.10 When Locations are damaged beyond Normal Use

- Turn off all gas utility services
- Turn off all electrical power utilities
- Turn off all phone line services
- Call all the above basic service utility companies for the location and advise them services will be discontinued until further notice
- For all utility companies, identify who you are, your job title and your authority to close the building or location
- Before closing the location take pictures of the inside and outside when possible
- In the event the utility companies cannot arrive immediately have trained personnel cutoff all utilities where possible
- Tape or rope off all areas when required
- Post No Trespassing signs at all locations
- Notify your supervisor immediately that the location is closed
- Notify the Owner immediately
- Monitor the location each morning and during the day
- Report any issues of illegal activity to your supervisor
- Complete all incident reports and insurance claims as instructed
- Lead and direct recovery efforts as required
- When in doubt call your supervisor

4.10.1.11 Criminal Activity

Criminal activity may occur during a major crisis or storm. These are a few steps to remember.

- Call the police immediately if you notice any criminal activity
- File a police report once the authorities arrive

- Take pictures of the areas around the location but do not enter the crime scene
- Do not tamper with anything that may be considered evidence
- Once the police report is completed then secure the location
- Do not allow anyone to enter the location including yourself, until supervisor or personnel from the Agency to arrive
- Keep all residents, by-standers or staff away from the locations until all reports and claims are completed
- Do not begin repairs or services until instructed by your supervisor
- Keep any resident who lived at this location informed of the status

4.10.1.12 Resident Relocation Services

- It may or may not be possible to offer relocation to residents during a major crisis depending on availability
- If approved by your supervisor and the Development Partner, another apartment at the current location can be offered to the residents
- If none is available, an apartment at a different location may be offered
- Do not offer money, concessions or reimbursement for temporary locations
- Lost personal property is not covered by insurance unless it is due to wrongful acts by personnel or staff
- Have the supervisor assist you in these matters
- Once informed your supervisor must report all issues to the Agency's Asset and Operations Manager
- Local emergency responding agencies can offer assistance to residents with any major losses. This may include funds for moving to another location.
- All site relocation budgets and expenses must be approved in advance of the expenditure by a Development Partner representative.

5.0 REPORTING / NOTICES

AOG Living's Regional Supervisors and Vice President of Housing have many cumulative years of affordable housing experience to include public housing, LIHTC, HOME funds, and Project Based Section 8 experience. These Orion personnel have also achieved affordable industry designations to include PHM, HCCP, TCS, and COS from industry trainers such as NCHM, Nan McKay, NAHRO and the National Association of Home Builders. These Regionals along with AOG in-house trainers will provide the in-house training required on the computer operating system utilized. The Orion Regional Supervisors will review reports for reporting inaccuracies.

Weekly reviews of operating reports shall be performed by the on-site managers and the Regional Supervisors. The Owners/Development Partners will be presented with weekly reports, and they will be reviewed in the operations system to monitor property benchmarks and error corrections required. These reports will include the following:

- Vacancy reports
- Vacant unit turnover
- Move-in admissions
- Move-outs-statements of deposits
- Tenant receivables
- Lost revenue
- Work order reports, emergency work orders completed - Closed within 24 hours
- Re-certification reports
- UPCS unit inspections/housekeeping inspections/building inspections-uploaded and work orders written

Weekly reports will be remitted as requested regarding property operations for all benchmark indicators.

Compliance reporting will include any and all audit responses to syndicators and state monitoring agencies. All affordable compliance responses will be remitted to the Development Partner for review if so, requested before submission to state monitoring agencies, equity partners, or syndicators.

6.0 FINANCIAL MANAGEMENT

6.1 TAXES

Personal property taxes for fixed assets are compiled on an annual basis for the AOG Living managed sites and filed on behalf of the sites annually if so, required by the state.

6.2 RECORDS AND REPORTS

AOG Living utilizes the ResMan property management/accounting software package. ResMan is internet-based software. The on-site module (ResMan) is real-time and updates the general ledger daily.



MANAGEMENT/MARKETING PLAN

We presently have the flexibility to report in any format due to Acrobat Reader PDF files. The General Ledger System is the foundation for the ResMan System. Data received from the on-site modules updates the general ledger with activity for accounts receivables and accounts payable.

Computerized payroll, accounts payable, general ledger maintenance and reporting are handled in our Houston office. Each property directly deposits rent and maintains a computerized real time rent roll system on-site. Our accounting department reconciles and reviews the on-site data on a weekly basis and cash is monitored daily. There are no "batch" entries; every check is detailed both in the expense account and in the cash account in the general ledger.

Our GLS system was designed to handle multi-company and project accounting, and provides the following reports:

- Chart of Accounts (ours or yours)
- Check Registers
- Invoice Registers
- Cash Receipts Registers
- General Journals
- MTD and YTD General Ledgers
- Project P & L's
- Consolidation P & L's
- Budget and Comparative P & L's
- Balance Sheets
- Cash Flow Statements

The ResMan logo consists of the word "ResMan" in a bold, blue, sans-serif font, with a registered trademark symbol (®) to the upper right of the "n".

The ResMan software package allows general ledger entries of current month transactions as well as prior and future month amounts within the current fiscal year. The GLS system also maintains a vendor analysis file to track payments made to vendors for 1099 preparation. Depending upon its size, each property has at least one PC for the operation of the property management software, and that PC communicates with the corporate office via the Internet.

Budget control is administered through the ResMan system. The system has a purchase order component which allows the purchaser to see real-time expenditures and the budgeted allowance for each category and line item. Being an online system, it gives the property manager and regional supervisor real-time data allowing them to monitor as frequently as needed.

6.3 BUDGETS

Budget control is administered through the Resman operating system. The system has a purchase order component which allows the purchaser to see real time expenditures and the budgeted allowance for each category and line item. Being an on-line system, it gives the property manager and Regional Supervisor real time data allowing them to monitor as frequently as needed.

Orion will provide an annual operating budget with income and expense expectations that achieve Owner and investor requirements. Budgets will be prepared and remitted to Owners by November 1st of each year and will include capital recommendations for the upcoming budget year.

The budget process will include reviewing year to date and month to date information from current and subsequent years. Vendors and utility companies will be contacted to confirm pricing for products and services and to identify potential increases. Information provided from capital assessment inspections will be incorporated into the budgets. Bids will be solicited for all projects, purchases, or services to ensure that costs of completing the budgets will be included in the budget projections.

AOG utilizes a detailed and analytical approach to budgeting. It begins with annual budget training for our Community Managers and Regional Supervisors at the beginning of August. The Community Managers prepare a budget binder, gathering all of the necessary data points for the upcoming year to assist in preparing for the upcoming budget. Regional Supervisors host a Budget Bootcamp to work as a team and complete the budget.

All budgets are completed within ResMan and contain a high level of detail, allowing Community Managers and Regional Supervisors the ability to create a well-thought-out business plan.

Within AOG, we employ a senior-level operator to own the budget process. This individual is knowledgeable in property operations and accounting. This is necessary to bridge the operators' need for a formulaic approach and quality assumptions and the reporting/accounting needs for line-item general ledger work and upload into Resman. Training and support for the operators and accountants throughout the process.

Based on the client's timeline requirement, AOG will prepare the property-specific budgets:

- Reforecast
- 12 Month Trailing (if applicable)
- Lease Expiration Matrix for the upcoming 18 - 24 months
- Current Market Survey
- Economic Forecast for the Submarket
- New Supply Pipeline
- Utility Rate Forecasts
- Contract Summary
- Bids/Proposals for Reoccurring Services
- Capital Plan
- Upon completion of the budget, the Regional Supervisor will also provide an explanation for any significant YOY (if applicable) variances.
- The budget requires a multi-level approval process and written approval from the client before it's pushed into the live Resman environment.

6.4 ACCOUNTING RECORDS

Project accounting is conducted according to Generally Accepted Accounting Principles (GAAP). Bank account information, financial statements, and accounts payable are maintained in the Houston corporate office. Each property has a separate bank account for operations. Funds are not coming between properties or between owners. AOG Living has assigned one person in our corporate accounting department to manage all property banking. This person is responsible for monitoring and the set-up and closing of all property bank accounts for our clients. He is also responsible for adding signatories to the property bank accounts as well. All interest earned on these operating monies remains in that account.



MANAGEMENT/MARKETING PLAN

All resident ledgers are maintained in the site's computerized management system at the property. The tenant lease files reside at the property site and are the responsibility of the property manager. With supervision from the Regional Manager, the manager is responsible for the normal upkeep of these files. Spot audits of these files are conducted on site by the Regional Supervisor during site visits. The Regional Supervisor visits assigned sites several times a week. The Regional Supervisors are assigned between 2-9 sites each and assignments depend upon geographic location and size of the sites.

Payables are managed by a different operating system. Operating budgets approved by the Owner are loaded into ResMan in January. On a weekly basis, invoices are entered into ResMan at the site level by the manager after the purchase is approved. The batch of invoices entered are then reviewed and approved by the Regional Supervisor.

The property invoices are then processed by the property payables clerk assigned to the property. All checks generated for payment are then reviewed and signed by an officer or principal of Orion before they are mailed out to the vendors.

The cash management of each property is managed by the property accountant assigned to the Agency accounts. This person coordinates and submits funding requests to the Agency finance department monthly to ensure funds are available to cover all disbursements for the month for each property. This same accountant is responsible for the accounting close outs of the Agency sites at month end.

Property accounting records are maintained in storage for previous accounting years, Current year files are maintained as working files at the Houston corporate office. The ResMan operating system also maintains historical electronic record files for each property that can be accessed at any time.

Annual audits are performed for the property accounting records by a firm assigned by the client and not associated or affiliated with AOG Living. Internal audits are also performed randomly by AOG Living to ensure checks and balances are applied.

AOG Living utilizes "best efforts" and internal checks and balances over accounting and financial transactions to ensure employee theft and fraudulent activity does not occur. If fraudulent activity is discovered, AOG Living will cover any losses that are determined to have occurred and replace all monies taken from client assets. The Client will be informed if such losses occur and the actions taken regarding the loss in accordance with the management agreement, barring any confidentiality restrictions by federal, state, or local law enforcement agencies.

6.5 MONTHLY REPORTS

Orion shall prepare a monthly management report or property financial comparing actual to budgeted figures for the receipts and disbursements and will submit each report to the Owner within fifteen (15) days after the end of the month covered. These financials will reflect all income collected for the month, expenses-both operating and capital, as well as cash flow. Agent shall provide other information with these reports to include general ledgers, aged account receivables reports, summary and detail balance sheet, statement of disbursements, and accounts payable reports.



A twelve-month trailing statement will be included as well as the project variance to budget explanations report.

Additional reports (including occupancy reports) will be provided as requested by the Development Partner from time to time with respect to the financial, physical or operational conditions of the property.

6.6 QUARTERLY AND ANNUAL REPORTS

AOG Living will compile custom and/or standardized monthly, quarterly and annual reports as required by the Development Partner's investors, syndicators, HUD, or the state/local monitoring agency.

6.7 ESTABLISHMENT OF OPERATING ACCOUNT

All rent and revenues from the sites are maintained in a property operating account established by AOG Living. Funds are not co-mingled between properties and all accounts are set up as described below:

Bank account information, financial statements, and accounts payable are maintained in the Houston corporate office. Each property has a separate bank account for operations. Funds are not comingled between properties or between owners. Allied-Orion has assigned one person in our corporate accounting department to manage all property banking. This person is responsible for monitoring and the set-up and closing of all property bank accounts for our clients. He is also responsible for adding signatories to the property bank accounts as well. All interest earned on these operating monies remains in that account. A separate bank account is established for security deposits.

6.8 DISBURSEMENT BY FIRM

Accounting Records, property disbursements from the property operating accounts are managed by the Resman operating system as described below:

Payables are managed by a different operating system. Operating budgets approved by the Agency are loaded into ResMan in January. On a weekly basis, invoices are entered into ResMan at the site level by the manager after the purchase is approved. The batch of invoices entered are then reviewed and approved by the Regional Supervisor.

The property invoices are then processed by the property payables clerk assigned to the property. All checks generated for payment are then reviewed and signed by an officer or principal of Orion before they are mailed out to the vendors.

The cash management of each property is managed by the property accountant assigned to the Agency's accounts. This person coordinates and submits funding requests to the Owner monthly if required to ensure funds are available to cover all disbursements for the month for each property. This same accountant is responsible for the accounting close outs of the Agency's sites at month end.

6.9 PROCUREMENTS

It is the policy of AOG Living to utilize minority, women, disadvantaged, and veteran owned business enterprises as well as Section 3 small businesses to the fullest extent possible. Staff is directed to take any and all reasonable steps in order to remove barriers that may inadvertently limit participation by MBE/WBE, disadvantaged, veteran and Section 3 small businesses to contract and subcontract with AOG Living. This policy shall be implemented in all areas of contracting, both direct and indirect.

Annually, contract services/vendors will be vetted and added to the Orion vendor list, therefore ensuring an ample supply of vendors for property services are maintained at all times. All recurring monthly contracts will be negotiated and cancelable with a 30 day written notice. All recurring service contracts will be re-bid annually to ensure competitive pricing is being obtained.

The Management Agent will obtain contract materials, supplies, and services at the lowest possible costs and on the terms most advantageous to the property, subject to the qualifications of the bidding entity.

All discounts' rebates, or commissions available with respect to purchases; service contracts and other transactions will be credited to the property account.

7.0 CAPITAL PROJECTS

7.1 SUPERVISION OF OWNER CONSTRUCTION

Allied-Orion can provide construction management services at the owner's request. These services and their costs will be addressed in a separate management contract addendum. These construction management services will include the following:

- Plan review and evaluation of construction documents
- Bid management, review, and analysis
- Preparation of construction contracts and their terms
- Providing on-site quality control oversight of trade work
- Processing change orders
- Coordinating and resolving technical issues that arise
- Reviewing and processing draw requests
- Development of punch lists for remaining work
- Develop, delegate, supervise, and accomplish close-out plan and deliverables.
- Obtainment of warranty book.

7.2 CONSTRUCTION MANAGEMENT FEE

- Monthly expenses to include
 - Salaries for Project Manager and on-site Superintendent
 - Travel
 - Time Spend on each project
- Ten (10%) percent of the project management and construction costs per project.

7.3 CAPITAL PLANNING

Annually, site operations are reviewed with the Development Partner before annual operating budgets are prepared to ensure that capital needs are included in the upcoming year's budget considerations. Future capital needs projects are discussed so that they might be included in future budget projections. On a weekly, and monthly basis, site operational reports are reviewed with the owner/asset manager so that operational adjustments can be made if warranted.

Management and marketing plans will be presented for review to address management recommendations regarding site operations and corrective actions to be taken to address both fiscal and physical pending issues.

A capital recommendation plan will be remitted with the proposed operating budget annually if so requested.

8.0 RISK MANAGEMENT

8.1 NOTICE OF CLAIMS

Insurance Claims / Incident Report

Employees are instructed as follows regarding incident reporting:

Complete an incident report with all the details you can list to help process the accident, claim or incident

- Time it happened
- Date it happened
- Name of person reporting the accident, claim or incident
- Address of the location of the incident or claim
- Address and phone number of the person reporting the accident, incident or claim
- Property Managers name and cell phone number
- Property address, fax and main phone number
- Description of what and how it happened
- Take pictures where it happened
- Send copies of all reports and pictures by fax or delivery mail service to the Agency main offices
- Immediately report the situation to the supervisor
- Immediately notify the Agency Asset and Operations Manager
- Be available to meet with the company personnel, residents and insurance claims personnel at the location or office when required.
- Work to complete all the reports to the best of your ability.
- The insurance adjuster will notify you of required visits and provide scopes or re-ports of the damages to the proper Agency personnel.
- The Agency will maintain the required paperwork, records and inform the Allied-Orion Regional Supervisor of any updates or status of the claims.



8.2. BONDING

Orion maintains an employee Crime policy that insures AOG Living in the amount of \$1,000,000 at all times to encompass employee theft.

8.3. NOTICES

AOG Living's employee instructions regarding emergency procedures are detailed in the General Office procedures manual located on the Allied-Orion website. Instructions regarding reporting and procedures are included in this section to include the reporting of casualty losses, fires, and accidents that may occur on the site. The Regional Supervisor for the site will review and forward the incident reports to the Owner within 24 hours. The Regional Supervisor will also notify the Owner by telephone immediately after such an incident occurs.

Any lawsuits served at the sites will be forwarded by the AOG Living Regional Supervisor to the Development Partner Representative or Asset Manager upon receipt of the service. City and State code violations received will also be forwarded to the Development Partner/Asset Manager immediately after they have been issued at the property site.

9.0 RESIDENT RELATIONS / COMMUNITY SAFETY

9.1 VAWA POLICY & EMERGENCY TRANSFER PLAN – EXHIBIT 4

9.2 TENANT COMPLAINTS

All resident complaints received, whether verbally by telephone, in person, or in writing, are noted in the "resident response" log maintained in each administrative office in a binder. This binder is always available for review by the client's representatives and the AOG Living Regional Supervisor. Complaints that cannot be satisfactorily handled by the manager are sent to the Orion Regional Supervisor. All grievance responses will be noted in the resident's files and in writing dependent on the seriousness of the issue. If the grievances are numerous, the Orion Regional Supervisor will visit the community to meet with the resident.

Grievance Procedure for Tenants:

- "Grievance" is defined as any dispute a Tenant may have with respect to a management action or failure to act in accordance with the individual Tenant's lease that adversely affects the individual Tenant's rights, duties, welfare, or status.
- AOG Living, Agency, and the Property Owner have established a Grievance Policy that includes, but is not limited to, applicability rules, an explanation of the grievance process, identification of applicable timelines, and procedures governing the hearing.
- The Grievance Policy is provided to Tenants at the time the lease is signed and is also available in the property management offices.

A. General Policy: Lease Termination

Either the owner or the Resident may terminate tenancy at any time in accordance with all applicable Federal, State and local laws and the lease terms.



B. Resident-initiated Lease Terminations

Resident may terminate tenancy by providing 30 days' written notice to the property manager in accordance with the lease.

C. Initiated Lease Terminations

Management and or its designated representative will terminate the lease only for a substantial lease violation; or

Repeated violations of the lease that disrupt the livability of the project, adversely affect the health safety or right or peaceful enjoyment of the premises of any tenant, interfere with the management of the project, or have an adverse financial effect upon the project, or

Failure to carry out obligations under the State of Texas Landlord/Tenant Act or
Other good causes (only at the expiration of the lease term).

The Owner, Agency, Management or its designated representative will give written notice of proposed lease termination in the form required by the lease and applicable regulations in English, or Spanish, or, in the case of a resident with disability, in the format requested by the resident.

Management is sensitive to the possibility that certain actions of a resident may be related to or the result of domestic violence, dating violence, sexual assault, or stalking and will offer a resident in this situation an opportunity to certify to such facts. The Violence Against Women Act protects individuals who are the victims of such crimes and misdemeanors from lease termination and eviction for criminal activity related to their victimization. Victims have 14 days to certify (on HUD form 5382) or provide other documentation of their status.

In addition, posters are included in the offices which inform the residents that they can report their complaints in writing via a survey card. The AOG Living Regional Supervisor's cell number is also posted in the offices so that residents may reach them for discussion if their concerns are not satisfied at the site level.

10. TENANT SATISFACTION SURVEYS

An easily accessible resident survey is always available on the AOG Living website for resident feedback concerning management services. A poster is placed into each office which features a QR code for resident utilization on their cell phones or the surveys can be filled out online for both Housing and Conventional Tax Credit sites. The surveys are sent directly to the Vice-President of Housing who then 'reviews them with the Regional Supervisors. Contests at the site staff level and among the residents in an effort to generate interest in these surveys are encouraged and recommended.

Approach to Ensuring First Class Customer Service

Our resident satisfaction survey and year-round feedback monitoring programs, combined with unrivaled support services, help clients boost resident satisfaction, loyalty, resident retention and the bottom line...and our unsurpassed programs can integrate feedback results online to enhance each property's online reputation.



Year-Round Resident Surveys

- 365 day/year Customer Relationship Management tool focused on key touch points
- Efficient means to identify service issues and provide remarkable recoveries
- Validate service delivery and performance as it happens
- Keeps staff focused and improves efficiency
- Resident will also have Regional Supervisor phone number and Email and can contact at any time.

*Managers are encouraged to escalate any issue to Regional Supervisor for **Successful** resolution.*

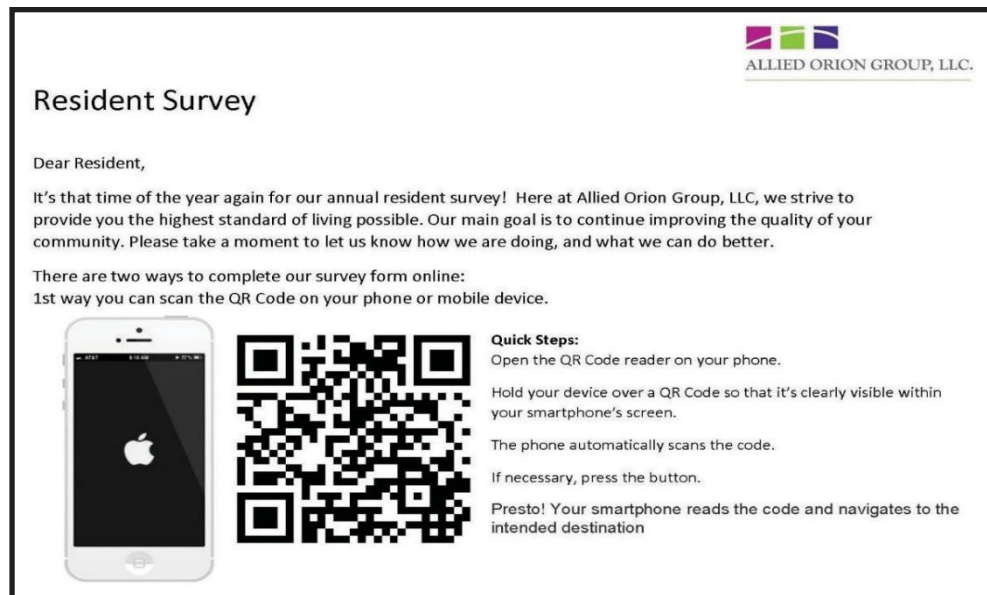
Find a way to say

Yes!



Sample Resident Survey

Active QR code. Feel free to scan QR code as a demonstration of process



11 COMMUNITY NEWSLETTER

A community newsletter will be generated monthly for each site through a third-party vendor. The newsletters will be distributed to the residents with door hangers on the outside of their front doors. Information regarding continuing program compliance, staff updates, scheduled events, and community projects or improvements will be shared in these newsletters. These newsletters can be utilized as a means of exchanging general information of interest to the residents.

The property websites will also be maintained by AOG Living as a communication tool to educate residents about the terms of their residency, continuing compliance, community events, scheduled improvements, and changes concerning community policies.

12 SUPPORTIVE SERVICES

AOG Living is dedicated to the provision of supportive services that assist residents in addressing their needs. However, each community is different as are the service needs of the residents. Therefore, supportive services are to be implemented in close coordination and communication with the residents to ensure that the services, programs and activities provided meet their needs and desires and fulfill the requirements in the Land Use Restrictions Agreement (LURA).

AOG Living's philosophy is to utilize the existing services available through public, private and community-based agencies and organizations, bringing services on-site to the maximum extent possible. It maybe recommended to utilize third party companies for the provision of supportive services based on the LURA and tax credit application requirements.

All record keeping with respect to services provided to and used by residents shall be collected and maintained by AOG Living or the third-party supportive service provider. These resident services manuals will be maintained for review during syndicator and state/local monitoring agency site audits.

13 SAFETY MEETINGS

Quarterly safety meetings will be held at the sites by the manager so that residents are presented with a forum to raise concerns or issues in person with site staff to include maintenance issues in their apartment homes. The manager will meet with local law enforcement officers on a weekly/monthly basis to discuss possible criminal activity or incidents occurring at their sites. Incident reports will be reviewed and corrective actions taken to include lease enforcement for documented criminal activity reported at the site.

14 SAFETY PREVENTION / INTERVENTIONS

AOG Living will participate in programs leading to the minimization of drugs, crime and vandalism while helping to provide linkages to the community and fostering stability of the resident population. Relationships and partnerships will be established between the management company, resident population, existing community-based organizations and local law enforcement agencies. Programs are expected to include, but are not limited to:

- Development of site-based community watch programs, as well as safety awareness training.
- Incentives for resident volunteerism.
- Periodic site reviews of lighting, green space and areas of criminal activity.

To the extent that funds are available through the operational budget, AOG Living will make recommendations as warranted for third party services to include camera installation/monitoring by third parties such as STEALTH.



WILLOW CREEK MARKETING PLAN

PREPARED BY:
AOG LIVING

15 MARKETING PLAN

AOG Living prides itself on designing memorable marketing and leasing strategies to ensure maximum market value. In addition, our unique "partnership management" style ensures that the goals and vision of the owner/developer are incorporated in the strategies of the communities. Marketing plans will be developed, and demographics targeted based upon site demographics i.e.; senior sites and/or the site affirmative plan.

Developing marketing strategies are crucial for the success of any community. Our marketing and lease-up teams are well versed in ensuring that each community has a unique plan that fits its positioning, client base and surrounding area. Each piece of marketing collateral will be designed to ensure that the community is remembered, associated and referred. Newspaper advertisements and community contact letters will be utilized for ongoing outreach efforts to attract a diverse applicant pool to the community, including minorities and persons with disabilities. In addition, when a vacancy occurs in an accessible unit, special outreach (telephone contact, letter, etc.) will be made to appropriate agencies to fill the vacancy with a person requiring the special features of the apartment.

15.1 Strategies to Achieve Occupancy Goals

The following marketing strategies are being recommended to assist in developing and maintaining occupancy goals as set forth by AOG Living.

- Curb Appeal/Signage
- Ready Units, Models, Mini-Models
- Common Areas/Amenities
- Resident Retention & Renewals
- Resident Referrals
- Site Promotions
- Resident Services
- Collateral/Print Advertising
- Industry Publications and Internet Sites
- Community Website
- Community Network Communications
- Merchant Referrals

- 15.2 Curb Appeal/Signage** The curb appeal of these communities is their lifeline. The “drive-by” traffic on most communities account for the majority of all traffic. In order to maintain this constant traffic, management will continue to ensure that all landscaping is performed on a weekly basis and color will be installed as allotted in the current budget. Balloons will be displayed on the weekends according to holiday themes and color schemes. Banners and bootlegs maybe utilized to advertise “special promotions”. Recommendations will be made for curb appeal enhancements and improvement/additions of site main ID and directional signage if warranted.



- 15.3 Ready Units, Models** Mini-Models will be used to demonstrate to prospective residents the exceptional appearance that can be attained in their new apartment home. One particular floor plan will be carefully selected paying particular attention to the tour route to this unit that will best feature the property’s outstanding amenities.
- 15.4 Common Areas & Amenities** – AOG Living will continue to maintain the common areas and amenities to the highest standards of excellence and if needed, we will expand on the amenities to meet the needs of our clientele.
- 15.5 Resident Retention & Renewals** - Work order-follow up: Random callbacks on Service Requests will be completed within 48 hours of completion. This will be done by phone calls and “rating” cards on 25% of all service requests.

Renewal follow up will be performed from move-in through lease expiration. The resident will be visited with 48 hours of move-in. Within two weeks a phone call or a card from the Property Manager will be sent and a subsequent follow-up will be performed at the one-month anniversary.

A phone call will be made to the resident at their six (6) month anniversary and 120 days prior to the lease expiration, the management team will again contact the resident to ensure the apartment and current level of service is to their satisfaction.



MANAGEMENT/MARKETING PLAN

Ninety days prior to the lease expiration, the resident will receive a thank you card. At that time, the card will remind the resident that their lease expiration is coming closer and a list of certification documents required will be attached to the thank-you note.

Sixty days prior to the expiration of the lease, a follow-up reminder letter will be sent. At thirty-five days personal visits will be made to their homes and a lease termination notice will be sent for non-compliance if all re-certification paperwork is not completed.

15.6 Resident Referrals - Exceptional service, along with the guarantee of a premier apartment home, has enabled AOG Living to capitalize on this source of traffic. Attractive door hangers will be left on each resident's door and posters will be placed in common areas advertising the resident referral fee.

15.7 Site Promotions - Move-In Gifts - Move-in gifts will be provided at the time of move-in. The management team will place the gift in the apartment home. In addition, appointments for move-ins will be scheduled to allow one (1) hour for orientation to the community, which will include a personal tour of the apartment home, and the amenities and to answer any questions the new resident might have.

15.8 Resident Services - When residents are treated kindly, they tend to remain residents over a longer period and will in turn generate more referrals for the community. Therefore, maintaining and nurturing the resident and management relationship through on-site events can help to stabilize the community and "close the back door" through excellent customer service.

15.9 Resident Functions

Resident functions will take place monthly and will be based on the interests of our residents. Functions and events will aid in retention by building a sense of community, and word-of-mouth advertising. The staff will use the resident clubhouse and common amenity areas for the functions and partner with local businesses to host events. Monthly events will include brunches, resident renewal pizza parties, back to school, and holiday events.

15.10 Collateral/Print Advertising Further recommendations will follow upon the takeover of the sites after review of occupancy rates and traffic analysis. Marketing collateral materials are the items by which the community will be remembered, associated and referred. The material must be consistent in its theme to offer the best marketing value for the money spent. The marketing collateral material

includes professionally designed but cost-effective brochures, business cards, mailers, stationery, and thank you cards. The marketing material will emphasize the positive and innovative qualities of the community, the unique and quality construction, outstanding views, atmosphere and amenities, and convenient location for a variety of activities as well as traffic arteries for commuters. The community's most unique selling features and amenities will be highlighted on all collateral material.





AT THE RIVER



EXCITING, UPGRADED AMENITIES

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- New Leasing Office
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- Library
- On-Site Maintenance Staff
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- Exercise Room
- Petric Areas
- Upgraded laundry facilities

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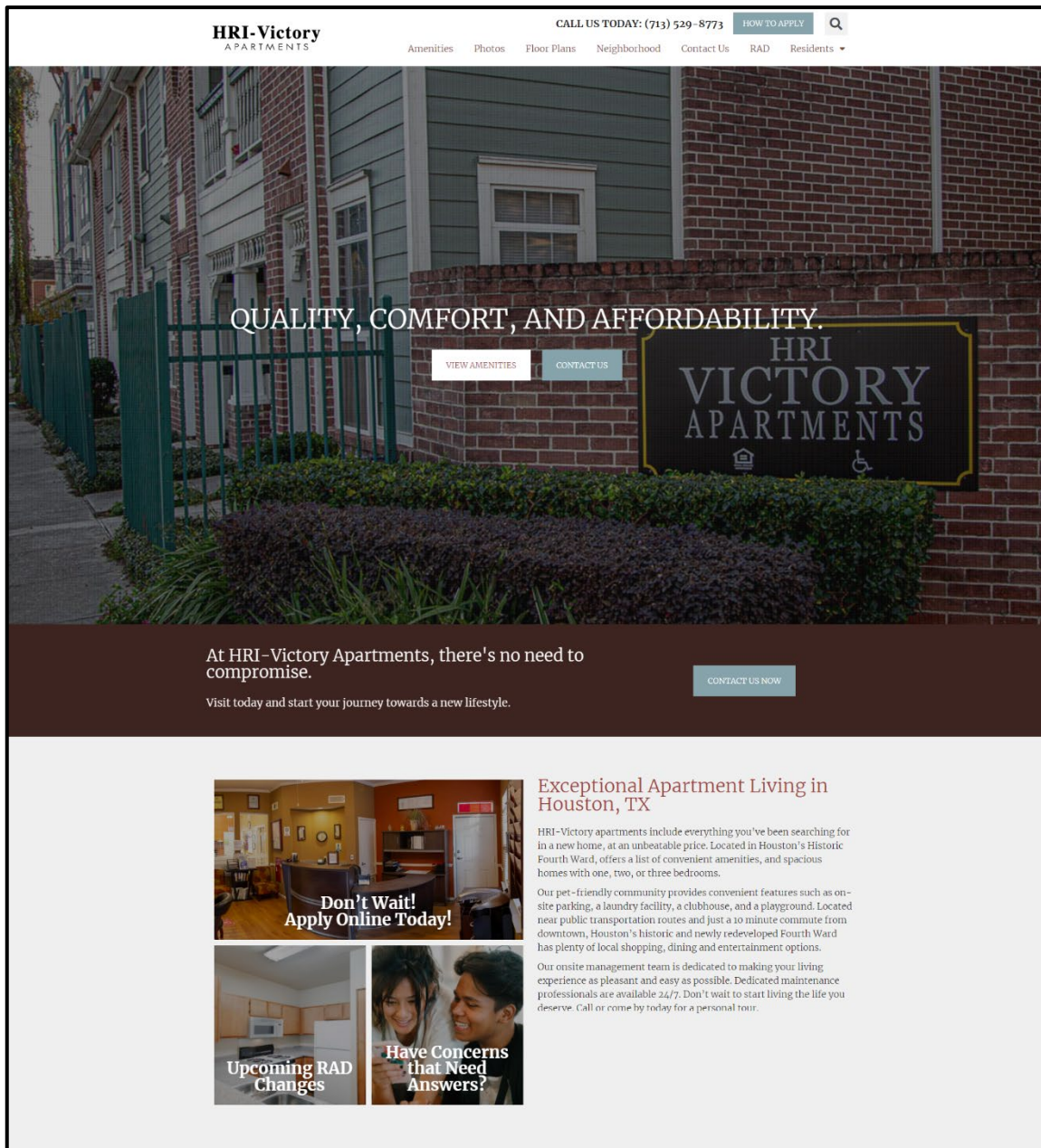
Windsor Maley At The River

www.wmatheRiver.com

[illegible]

15.11 Industry Publications and Internet Sites, in order to gain and maintain maximum exposure and name recognition, print advertising and Internet sites are necessary to connect with the population through widespread distribution and technology. In all cases, advertising will be full of life, energy and excitement, highlighting the sense of “community” and the myriad of activities available without having to leave the area.

15.12 Community Website, the website design will be personalized for the community. It will include amenities, floor plans and all the reasons why a prospect would want to live there. The website will also allow clients to make inquiries about the community, including any current specials that are being offered. The site will include capability to connect all utility/ancillary services, as well. The website will be advertised in all collateral materials including all leasing banners. On Rad sites, a link will be added to connect to the agency website for the addition of applicants to the agency wait list. The RAD sites will also include general informative information for the residents regarding the RAD program and the program requirements as they pertain to the resident's occupancy at their Rad community.



The screenshot shows the HRI-Victory Apartments website. The header includes the company logo, a navigation menu (Amenities, Photos, Floor Plans, Neighborhood, Contact Us, RAD, Residents), and contact information (CALL US TODAY: (713) 529-8773, HOW TO APPLY, and a search icon). The main banner features a photograph of the apartment building with the text "QUALITY, COMFORT, AND AFFORDABILITY." and buttons for "VIEW AMENITIES" and "CONTACT US". Below the banner, a dark bar contains the text "At HRI-Victory Apartments, there's no need to compromise." and "Visit today and start your journey towards a new lifestyle." with a "CONTACT US NOW" button. The lower section has three columns: the first with an interior photo and "Don't Wait! Apply Online Today!", the second with an interior photo and "Upcoming RAD Changes", and the third with a photo of a couple and "Have Concerns that Need Answers?". The right column also contains the heading "Exceptional Apartment Living in Houston, TX" and descriptive text about the property's amenities and location.

- 15.13 Community Network Communications,** the outside marketing campaign will concentrate heavily on personally visiting and sending the site's information to area businesses, large and small as well as church groups and area hospitals that may have numerous employees. Additionally, by utilizing the property demographics established from existing residents who are still in the workforce, any company with three or more employees already living at the site will be added to the networking list. Each company will be phoned to identify the appropriate contact to provide them with brochures and property information for distribution to associates. Local Housing Agencies will be visited in order to establish a rapport with the counselors who place the Section 8 vouchers for the area where the site is located.

- 15.14 Churches** and religions organizations often offer very good opportunities to reach their parishioners. There are an abundance of churches and religious organizations in our area and many offer advertising outlets, such as newsletters and bulletin boards. Organizations providing these type opportunities will be identified and pursued.



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- 15.15 Merchant Referrals,** Area businesses will be targeted in order to introduce ourselves to the local merchants. Business owners and managers will be given Merchant referral cards, to encourage them to help spread the word. For each referral that leases, a gift certificate will be purchased from their place of business. These certificates can then be used as door prizes or to purchase items for resident functions.

MARKETING PLAN SUMMARY

AOG Living has been involved in the successful lease-up of approximately 50 communities in three states over the past five years. Developers of both Class A and Affordable Housing look to Orion to ensure that each and every aspect of opening and marketing a community is completed above any industry standards. Orion prides itself on designing memorable marketing and leasing strategies to ensure maximum marketing value. In addition, our unique “partnership management” style ensures the goals and vision of the owner/developer are incorporated into the strategies of the community.

In addition, the AOG Marketing Team will provide collaborative marketing support for both the Regional and the site teams. These corporate support efforts can be described as follows:

Branding Objective

AOG Living’s (AOG) marketing team has deep experience in managing strategic marketing programs customized to meet a variety of factors, such as client goals, budgets, and pricing efficiencies. We integrate digital and traditional marketing strategies to generate exposure, drive community traffic, and convert leads to leases.

Our marketing team is responsible for strategically directing and managing national and local marketing programs in each community. This includes branding strategy, search engine marketing, online advertising, and outreach marketing.

This group also manages work completed through third-party suppliers, including developing and creating design briefs, identity development and brand messaging, community websites, and integrated marketing action plans to drive qualified leads to the communities.

Our LIHTC properties will welcome prospective applicants with Section 8 vouchers or certificates and provide them with the same consideration for occupancy as any other applicant. Newspaper advertisements and community contact letters will be utilized for ongoing outreach efforts to attract a diverse applicant pool to the community, including minorities and persons with disabilities. In addition, when a vacancy occurs in an accessible unit, special outreach (telephone contact, letter, etc.) will be made to appropriate agencies to fill the vacancy with a person requiring the special features of the apartment.

Brand Objective

The first step is to craft the brand identity and establish name recognition for the community. A multi-faceted approach with traditional, digital, and social media marketing will gain the largest reach and awareness. You will find our branding and marketing approach to be strategic, informed, holistic, and integrated.

The AOG Marketing Team will work to ensure the following deliverables:

- Clearly defined customer personas.
- An authentic, well-articulated brand story that speaks to our persona profiles.
- A cohesive, creative campaign.
- An immersive, visual, and responsive website.
- A strategic paid search and SEO program.
- A branded buying experience that is personal and paperless.

Marketing Collateral

A comprehensive marketing and leasing collateral package will be created and consist of brochures, sell sheets, stationary, business cards, and unique marketing materials for outreach and grass- roots marketing.

Full Community Website

The cornerstone of our marketing program is the community website. Each community has its own custom, fully integrated website with an intuitive path to crucial information and functionality: pricing, availability, and online leasing. The flexible digital platform with Razz affords us the opportunity to efficiently create distinct messaging paths designed to appeal to the community's target personas.



Search Engine Optimization/Pay-Per-Click Campaign

Successful SEO is all about relevancy. Google measures relevance through its 'black box' metrics that include time on site, pages viewed, clicks, and bounce rates, to name a few. Our website strategy focuses on creating relevancy and begins with a solid content strategy based on clearly defined persona paths. The site will be built according to best practices to ensure the back end is crawlable by search engines.

Paid Search Advertising

Our strategy is to put in place an aggressive campaign that will start prior to the first units being delivered. This will help with creating a higher Google Organic Ranking for a brand-new URL, building brand awareness, and in general pushing for lots of buzz and traffic for hard hat tours and encouraging pre-leasing. We will look to target surrounding areas to bring in new prospects. If functionality is not up on the website, we will want to start a display campaign and a lower-paid search. Data-driven display, Retargeting, Facebook, and Facebook Retargeting will close the gap in generating new traffic and build a full audience on all platforms. Facebook retargeting is always helpful as a push as it has high click-through rates to the website.

Affordable Housing.Com

This was previously GO-SECTION 8 and it will feature the community to prospective applicants seeking Section 8 housing.

Internet Listing Services

With an expansive footprint throughout the U.S., we have well-established relationships with the major Internet Listing Services and competitive national marketing pricing. Whether you are looking for a simple, low-cost marketing package or a highly visible package with supplementary products to drive traffic during a lease-up, rest assured that you will get the best pricing and options to achieve your community's performance goals.

Social Media

We will work with Chatmeter to amplify our social presence by monitoring and engaging with residents and their connections across social channels.

The AOG Marketing team will train the onsite team to manage Facebook, Twitter, Instagram, Google, Yelp, and YouTube from the same dashboard. Social media metrics will let us measure how well your posts are performing.

Online Reputation Management

AOG embraces resident feedback. Negative comments and reviews appearing online are inevitable. Online behavior is changing rapidly, and consumers are utilizing new sources to learn about our communities. Nearly 9 out of 10 prospective residents turn to online reviews and social networking to help make buying decisions. Negative reviews and an unmanaged profile can be costly, considering most internet users will likely find reputation content before your website. A Response Strategy is crucial for nurturing our online reputation and grabbing hold of the community brand perception.

Reviews

We work with Chatmeter to assist in receiving positive reviews and a high average star rating. Intensive customer service response protocol training program administered to the Regional Supervisor, Community Manager, and Marketing Manager.



Marketing Services

We take a strategic approach to building your asset's brand value. By implementing integrated Marketing campaigns, we reach targeted demographics, driving qualified leads to achieve your investment goals.

Services Include:

- Marketing strategy and implementation
- Digital marketing
- Brand development and management
- Permanent signage services
- Reputation management
- Public and media relations

Key System Integrations:

- National and Local Internet Listing Services
- Social + Reputation Management | Chatmeter
- Anyone Home | CRM + ILS Tracking
- ResMan | Razz
- Google PPC + Analytics