



Senior Living Facilities CCR Draft Policy Scenarios

Reasoning to Adopt Alternative Policy for Multi-Family Proactive Inspection Program

- Current proposed policy limited in scope to only senior living facilities (apartments), which has been difficult for the task force to define & identify
- Current proposed policy may be too complicated with multiple violation thresholds using a mix of life safety & property maintenance violations
- Alternative policy focusing on multi-family apartments intends to monitor hazardous, frequent offenders with a program that's simpler, more understandable & more enforceable

Registration & Inspection Program for only Senior Living Facilities to All Multi-Family

Current Policy: Senior Living Facilities Program	Alternative Policy: Multi-Family Program
Proposed Changes	
<ul style="list-style-type: none"> • Only properties meeting definition of senior living facilities eligible for program participation 	<ul style="list-style-type: none"> • All multi-family properties eligible for registration & inspection requirements
<ul style="list-style-type: none"> • Frequent offenders who meet violation threshold in 12-month period required to register 	<ul style="list-style-type: none"> • Frequent offenders who meet violation threshold in 12-month period or determination by DSD Director required to register
<ul style="list-style-type: none"> • Qualifying violation (QV) threshold focuses on life safety & property maintenance violations 	<ul style="list-style-type: none"> • Qualifying violation threshold focuses on life, safety & structural (LSS) violations only. Property maintenance violations handled through regular SAPMC process. Any violation can be appealed.
<ul style="list-style-type: none"> • 3-day warning period where opportunity given to address violations without counting as QV 	<ul style="list-style-type: none"> • No 3-day warning period; presence of LSS violation counts toward registration threshold
<ul style="list-style-type: none"> • 2 size-dependent program registration thresholds, with multiple levels based on violation count 1) 0-99 Units: 2 Tier 1 or 5 Tier 2 violations 2) 100+ Units: 3 Tier 1 or 10 Tier 2 violations 	<ul style="list-style-type: none"> • Two program thresholds related to ratio of unresolved violations: 1) Training threshold - 2% of LSS violations not in compliance & receive citations (min 1/max 4 citations); only training required, no registration 2) Registration threshold - 5% of LSS violations not in compliance & receive citations (min 1/max citations); (min 4/max 16); registration & inspections required
<ul style="list-style-type: none"> • \$6/unit fees for registered properties does not cover expenses; cost recovery closer to \$60/unit 	<ul style="list-style-type: none"> • Fees to be determined; further analysis needed
Consistent Proposals	
<ul style="list-style-type: none"> • 2 year pilot program 	<ul style="list-style-type: none"> • 2 year pilot program
<ul style="list-style-type: none"> • On-site education & training focused on issue prevention available to all senior living facilities 	<ul style="list-style-type: none"> • On-site education & training focused on issue prevention available to all senior living facilities
<ul style="list-style-type: none"> • Appeals process for registration requirement 	<ul style="list-style-type: none"> • Appeals process for registration requirement
<ul style="list-style-type: none"> • All registered properties subject to proactive inspections from dedicated officers 	<ul style="list-style-type: none"> • All registered properties subject to proactive inspections from dedicated officers
<ul style="list-style-type: none"> • Dedicated officers respond to all complaints at registered properties 	<ul style="list-style-type: none"> • Dedicated officers respond to all complaints at registered properties

Alternative Policy: Multi-Family Violation Priorities

Tier 1 – Life, Safety & Structural (LSS)	TIER 2 – Property Maintenance
• Electrical (exposed, overloaded outlets)	10-Day Notice of Violation
• Smoke detectors (missing, non-working)	• Water leaks and/or wasting water
• Sewer leaks/breaks	• Holes/cracks in walls and ceilings
• Stairs, ramps and walkways (egress)	• Accumulation of trash and garbage
• Proper water supply to all units (hot water)	• Tall grass and weed maintenance
• Doors and windows (properly maintained)	• Dumpster maintenance
• Patios and balconies (structural)	• Parking lots
• Guardrails and handrails	• Sidewalks
• Mechanical (boilers, HVAC, water heaters)	• Swimming pools
• Structural members (exterior walls, roofs & ceilings)	• Security gates
• Water leaks and/or wasting water	• Junked vehicles
• Infestation (roaches, rodents, bed bugs)	
• Major sewer breaks	

NOTE: Alternative proposal removes Property Maintenance violations from counting toward registration requirements. Only those violations impacting Life, Safety, and Structural (LSS) conditions will count toward registration requirements. Found Property Maintenance violations will be handled through regular process.

Qualifying Violation Threshold – Alternative Policy, Multi-Family Program

Program Participation	Citation Count Equal to % of Property's Units	Minimum Number of Citations	Maximum Number of Citations
Training Required	2%	1	4
Registration Required	5%	2	8

NOTE: If a violation is confirmed, property is issued a notice of violation with a timeframe to resolve the issue. If timeframe expires and the violation is not resolved, a citation is issued. The number of citations for non-compliant violations & ratio of property's units will determine if training and/or registration is required.

Qualifying Violation Threshold Example – Alternative Policy, Multi-Family Program

	Number of Units	Multi-Family Program Threshold		Multi-Family Program Examples	
		Training (2% of units, or min 1/ max 4 citations)	Registration (5% of units, or min 2/ max 8 citations)	LSS Citations in 12 months	Outcome
Property A	10	1	2	1	Training Required
Property B	30	1	2	2	Registration Required
Property C	50	1	3	2	Training Required
Property D	100	2	5	1	No Requirements
Property E	150	3	8	7	Training Required
Property F	200	4	8	10	Registration Required