



City of Bellingham

HOME REHABILITATION PROGRAM GUIDELINES – PILOT PROGRAM: Owner-Occupied Childcare & Adult Family Home Loans

Purpose of the Home Rehabilitation Program

The City of Bellingham carries out a Home Rehabilitation Program (HRP) as allowed by 24 CFR 570. The HRP for childcare and adult family homes operates under the same basic parameters as the standard HRP. Specifically, this program is to:

- First and foremost, provide general benefit to the low- and moderate- income residential occupants of the home, which must include the owner-occupant;
- Assist property owners within the city limits of Bellingham in the repair or rehabilitation of their homes for health and safety reasons, and to comply with state standards for operation of an in-home childcare facility or adult family home (AFH);
- Increase the availability of childcare facilities and adult family homes in the community for low- and moderate-income residents;
- Offer loans that are within a homeowner’s financial capacity; and
- Improve energy efficiency and conservation of resources.

Who Qualifies

- Individuals who own a home within the City limits of Bellingham, WA and occupy that home as their primary residence; and
- Homeowners who earn at or below 80% of the Area Median Income (AMI)¹; and
 - will provide housing and care to adults who are in need of long-term care that qualify as low income (Medicaid recipients), in their primary residence; or
 - will provide childcare for families that qualify as low or moderate income (less than 80% AMI), in their primary residence.

See “Eligibility Criteria” Section for complete details on qualifying for this program. See “Income Determination” Section for details on how incomes are determined for the purposes of this program.

Financial Assistance

The City provides financial assistance to repair or rehabilitate your home as a loan. Qualification and terms depend on the homeowner’s income and net assets. (See "Loan Terms" Section below.)

Funding for the Home Rehabilitation Program comes from the U.S. Department of Housing and Urban Development (HUD), Community Development Block Grant (CDBG) Program.

¹ Income limits depend on household size. Currently this would be an income of \$48,750 for a 2-person household (adjusted annually). See “Maximum Annual Gross Income” on page 11 for 2018 Area Median Income limits.

Each year, the City has set aside funds for the Home Rehabilitation Program with the anticipation that funds will be paid back over time. When the funds are paid back, the City is required to reinvest those funds into projects or programs that benefit low- and moderate-income households.

Loan Terms

The Home Rehabilitation Program will charge interest rates depending on the homeowners' net worth. Net worth will be defined exclusive of retirement accounts. Interest rates will have a minimum (1%) and a maximum (5%).

1. Net Worth \$250,000 or below: Those homeowners with a net worth \$250,000 or below will be charged 1% interest rate for a 15-year term.
2. Net Worth above \$250,000: Those homeowners with a net worth of more than \$250,000 will be charged 1% ***below*** the Wall Street Journal Prime Rate for a 15-year term. For example, if the Prime Rate at closing is 3.50%, the loan would then carry a fixed rate of 2.5% for the 15-year term.

TYPES OF LOANS

Deferred Payment Loan with a 10-year Term

Who Qualifies: Homeowners that are under the age of 62 that have a household income less than 80% area median income (AMI), and will provide in-home care to low income adults (Medicaid recipients), or children from families that are low- to moderate-income (less than 80% AMI).

Interest Rate: Interest will be charged at a fixed rate of at least 1%, but no greater than 5% (see Loan Terms, above).

Terms: The home rehabilitation loan payment is deferred for 10 years, and interest is calculated for 15 years. The loan is due when the house is sold, the property title is transferred, or there is a change of use or occupancy. A change of use includes if the homeowner ceases to occupy and operate as an AFH or as a childcare provider. At 10 years, the homeowner's financial situation will be comprehensively reviewed, and the loan may be refinanced, using Housing Rehab Program underwriting policies. Loan refinancing may include market-rate interest and quarterly payments due beginning at year 10, depending on the household's financial situation.

Loan Amount: Up to \$75,000.00 may be borrowed, depending on the amount of lead paint stabilization work needed as part of the rehabilitation. Exceptions may be granted on a case by case basis (see "Loan Limit Criteria" Section below).

Deferred Payment Loan

Who Qualifies: Homeowners that are disabled and/or over 62 years of age that qualify as low or moderate income (income of 80% AMI or less), and will provide in-home care to low income elderly or disabled adults (Medicaid recipients), or children from families that are low- to moderate-income (less than 80% AMI).

Interest Rate: Interest will be charged at a fixed rate of at least 1%, but no greater than 5% (depending on homeowner assets)

Terms: The home rehabilitation loan payment is deferred, and interest is calculated for 15 years. The loan is due when the house is sold, the property title is transferred, or there is a change of use or occupancy. A change of use includes if the homeowner ceases to operate as an AFH or childcare provider.

Loan Amount: Up to \$75,000.00 may be borrowed, depending on the amount of lead paint stabilization work needed as part of the rehabilitation. Exceptions may be granted on a case by case basis (see "Loan Limit Criteria" below).

Loan Limit Criteria

Exceptions to increase loan limits may be granted on a case-by-case basis.

If housing components are identified through a risk assessment conducted by a certified risk assessor as having lead paint hazards containing lead above the HUD and EPA threshold,² the project cost must include the costs to cover the safe removal and replacement of lead-based painted components as long as non-lead related work does not exceed \$25,000.00.³ In the case of a dwelling unit that is identified as having no lead present through a lead risk assessment or lead screen conducted by a certified risk assessor, the loan maximum is \$75,000.00 to bring the dwelling unit up to Local Housing Standards and into compliance with state AFH or childcare facility minimum requirements.

Non-Assumable

Upon sale or other transfer of the property, whether by operation of the law or otherwise; in the event that the property ceases to be used as the primary residence of the owner; or upon ceasing operation as an adult family home (AFH) or childcare facility, the loan amount will, at the lender's option, become due and payable.

² Lead-Based Paint means paint or other surface coatings that contain lead equal to or exceeding 1.0 milligram per square centimeter or 0.5 percent by weight or 5,000 parts per million (ppm) by weight.

³ Federal law requires lead abatement rather than lead risk assessment if non-lead related work is more than \$25,000. The City of Bellingham does not at this time have a lead abatement program.

ELIGIBILITY CRITERIA

Applicant Priority

The Home Rehabilitation Program assists low to moderate income households. The city's 2018 Consolidated Action Plan identified a need for more long-term housing for special needs populations such as the elderly and disabled, and affordable childcare for low- and moderate-income families. The following households on the city's waiting list will receive first priority for housing rehabilitation services:

- Moderate income households (80% AMI or below). See “Maximum Annual Gross Income Table” at the end of this document.
- Homeowners who will provide long-term care for low income seniors (60% AMI and age 62 and over).
- Homeowners providing long-term care for disabled persons under age 62 who receive Medicaid.
- Homeowners who will provide childcare in neighborhoods where local elementary school enrollment in the Free and Reduced Meals program is above city average, and to families who receive childcare vouchers.
- Veterans.

Applicant Eligibility

- Applicant must own a home within the City limits of Bellingham, WA, and occupy that home as their primary residence.
- Applicants must fit the criteria under the respective loan type.
- Applicant must be credit worthy.
- Applicant must complete all necessary coursework and receive the appropriate licensing from the state within no more than 1 year after the remodel work is complete.
 - If starting a childcare business, applicant must have completed a Department of Early Learning licensing orientation course, and must commit to participating in the Department of Early Learning's [Early Achievers Program](#) (an ongoing training and support program).⁴ Applicants must provide a course completion certificate and signed agreement to participate in Early Achievers. See Appendix A for process and requirements for starting a childcare business.
 - If starting an adult family home (AFH) business, applicant must have completed a Department of Health and Social Services prospective provider orientation and be enrolled in (or have completed) the AFH Administrator's course. Applicants must provide course completion certificate and/or proof of enrollment. See Appendix B for process and requirements for starting an Adult Family Home.

⁴ In addition to the requirements of this loan, the Early Achievers program requires 5% of children served (and a minimum of one child) to be childcare subsidy voucher recipients.

Participation Requirements

- Applicant agrees to allow Home Rehabilitation Program staff to photograph exterior/interior and before/after views of the property.
- A program sign is placed in the front yard (location decided with borrower approval).
- All loans must be secured with a Deed of Trust.
- Adequate fire, hazard, and liability insurance must be maintained to cover total liens against the property.
- All taxes, assessments, and insurance premiums currently due on the property must be paid prior to loan closing.
- If the property will be used as an AFH, at least fifty one percent (51%) of the residents⁵ must be low income (or Medicaid recipients) at loan closing or initial occupancy (whichever is later) and verified annually.
- If the property will be used as a childcare facility, at least fifty one percent (51%) of the children must be from low- or moderate-income households (80% AMI or less) at loan closing or initial startup (whichever is later) and verified annually.
- The rehabilitation project is expected to be complete within six months from signing the promissory note and deed of trust. Failure to complete construction within that time period may result in loss of funding.
- Other requirements, as described in Appendix A (if starting a family childcare) and Appendix B (if starting an adult family home).

Income Determination

- Eligibility for the Home Rehabilitation Program is based on the household falling below HUD Program Income Limits and serving predominantly clients who fall below HUD program income limits (80% AMI or less).
- The City determines annual income as the *adjusted gross income* as defined for the purpose of reporting under IRS Form 1040 series for individual Federal annual income tax purposes. The City will use HUD's [Technical Guide for Determining Income and Allowances for the HOME Program](#).
- Gross income includes income received by all household members, aged 18 years and older, which is taxable under the IRS guidelines and any other taxable income as defined by the IRS Code, including, but not limited to the following:
 - All income in the form of wages, salary, bonuses, and tips.
 - The amounts received from social security, pensions, and annuities.
 - Payments in lieu of earnings, such as unemployment compensation, other taxable social security benefits, and dismissal wages.
 - Benefits in lieu of earnings other than lump sum payments under health and accident insurance.
 - Alimony and the like.

⁵ This includes AFH client residents as well as the homeowner household.

- Subsistence allowance or receipts in connections with education or training.
- Income from earning assets, rental income.

Property Eligibility

- The property must be located within the city limits of Bellingham.
- The home must be a residential structure with adequate space for the number of children or residents to be served.
- At the time of application, the residential property value must generally be at or below 95% of the area median property value. [In 2018, this was \$360,050.]⁶
- The Program will only allow for rehabilitation of non-living space (such as a garage, an outbuilding, or detached garage) if it is determined by the Loan Review Board to be necessary and of general benefit to the residential occupants of the home.
- The property must be in need of rehabilitation or repairs due to one or more of the following conditions, as described in the [Home Rehabilitation Loan Program, Local Housing Standards](#), and/or does not meet current minimum licensing requirements for an AFH or childcare facility, as described in the [Washington Administrative Code \(WAC\) Chapters 388-76 or 388-145](#). This may include:
 - Structural defects
 - Inadequate or hazardous heating facilities
 - Inadequate or defective plumbing system
 - Inadequate or hazardous electrical system
 - Inadequate ventilation
 - Inadequate energy conservation
 - Inadequate long-term maintenance
 - Lead-based paint or asbestos hazard⁷
 - Any other hazardous condition
 - Lacking sufficient sanitation, cooking, living, or recreation space for residents or children necessary to meet licensing requirements
 - Lacking safety or accessibility features such as ramps, fences, gates, or emergency exits necessary to meet licensing requirements
- The residence is required to meet Local Housing Standards after rehabilitation.
- Health and safety items, as specified by the Home Rehab Program staff, must be corrected using no more than the maximum loan amount for which the applicant qualifies.
- A residence in need of less than \$5,000 in rehabilitation repairs is generally not eligible.

⁶ Staff will review your application against the current value limit. Exceptions to this limit will be considered if the home value alone (excluding the land value) does not exceed 75% of the maximum property value, or if there has been deferred maintenance combined with financial distress in the past 3 years.

⁷ Lead based paint must be abated or stabilized in any structures that will be used as a childcare facility. Lead based paint must also be stabilized if children will be present in an adult family home.

- Exceptions may be granted on a case-by-case basis. An inspection to identify those conditions not meeting Local Housing Standards will be conducted. The inspection will only specify observed conditions that fail to meet Local Housing Standards. It will not warrant correction of, or protection against, latent conditions.

The total property debt, including the Home Rehabilitation Program loan, may not exceed 90% of market value of the property after rehabilitation.

SCOPE OF REPAIR & REMODEL WORK

Priority 1: Health and Safety Improvements

Items necessary to bring the property into a safe and sanitary condition including, but not limited to:

- Leaking plumbing
- Rotten wood
- Overloaded electrical system
- Broken windows
- Leaking/damaged roof
- Tripping hazards
- Presence of asbestos lead-based paint, if children are present

Priority 2: Licensing Requirements

Items necessary to bring the property into compliance with state minimum licensing requirements for an AFH or childcare facilities, provided these items are of general benefit to the residential occupants of the home. This may include installation of or making modifications such as:

- Windows and window coverings (blinds, screens)
- Ramps and handrails
- Grab bars
- Wheelchair accessible or walk-in bathing facilities
- Installing or expanding accessible deck or patio
- Fencing and gates to secure outdoor play areas or outdoor resident areas
- Ventilation
- Fire extinguishers
- New doors, door handles, and locks that comply with licensing requirements
- Washable, water-resistant flooring in kitchen and bathrooms
- Locking cabinets for safe storage of hazardous materials or medication
- Emergency exits that comply with licensing requirements
- Non-breakable lighting fixtures
- Heating and air conditioning units to maintain required indoor temperatures

After renovation, the property must meet the minimum requirements for the intended in-home business purpose, as described in the [Washington Administrative Code \(WAC\)](#) Chapters 388-76 or 388-145.

Priority 3: Long Term Maintenance

Loan funds may be used for Priority 3 only after provisions have been made to complete all Priority 1 and 2 items. Those items which will appreciably reduce future maintenance and operating costs to the owner:

- Exterior painting, insulation, window replacement, gutters, roofing, heating, etc.
- Purchase of equipment is limited to stoves, refrigerators or built-in fixtures and **only if the existing equipment is unsafe, unsanitary, or lacking**. Price of appliances: new refrigerators not to exceed \$1,000; new range not to exceed \$700. Installation, delivery, and tax are exclusive of the price limit.
- Energy efficient/energy star rated appliances are required for appliance, heating or plumbing replacements.
- Heating: Electric base board heaters may be upgraded to forced air wall heaters, hydronic heaters or installation of a ductless mini-split heating system; gas furnace replacement will be with a 90% AFUE rated or better gas furnace.
- Hot Water Heaters: Existing hot water heater will be replaced with a High Efficiency Water Heater/Energy Star Qualified Hot Water Heater as practical.
- Plumbing: when plumbing fixtures are replaced, low flow fixtures will be installed (i.e., toilets, showerheads, faucets).
- Alternatively, use of recycled fixtures from used appliance stores such as the Appliance Depot or ReStore may also be allowed.
- Installation of rain barrels is an allowable expense.
- Energy conservation improvements are done in coordination with other repair or rehabilitation efforts, such as window or furnace replacement.

The following items are considered limited under the Home Rehabilitation Program:

- Landscaping is limited to the repair of the grounds following rehabilitation and the removal of hazardous conditions.
- Ineligible items include, but are not limited to, the following:

Intercom systems	Kennels	Furniture
Outdoor fire places	Central vacuum	Portable appliances
Detached greenhouses	Hot tubs or spas	Area rugs
Tools	Materially increasing the footprint of the home	

CONSTRUCTION PHASE

The City will assist in all phases of the Program from loan application through construction. It is the policy of the Program that a general contractor oversees construction. Some exceptions may be granted if approved by the City's Rehabilitation Specialist. The Rehabilitation Specialist will work with the homeowner to develop a scope of work and solicit contractor proposals. The homeowner selects the contractor from proposals based on the scope of work prepared by the Rehabilitation Specialist and approved by the homeowner, in compliance with appropriate Washington Administrative Codes. Exceptions for homeowners to act as their own contractors are at the sole discretion of the Program staff.

Lead Hazards

If your home was built before 1978, it may have lead-paint hazards that could pose a particular hazard to children aged six and younger. The City will require a lead-paint hazard assessment for your home, or lead-based paint will be assumed to be the present. Lead paint hazards identified in the risk assessment must be addressed in accordance with the Residential Lead-Based Paint Hazard Reduction Act of 1992—Title X.

The costs associated with a Lead-Based Paint Risk Assessment and the cost of clearance testing on work performed on lead-painted surfaces will be provided to the homeowner as a GRANT, with no expectation that the funds be paid back.

Loan Review Board (LRB)

The LRB reviews each loan application based on the eligibility criteria described in these Guidelines, the applicant's financial situation and credit history, the condition of the structure and the recommendations of the staff members. The LRB may make some exceptions to these guidelines on a case-by-case basis.

After Board approval, a promissory note and deed of trust are signed as security for the loan and recorded at the Whatcom County Auditor's Office. Interest calculations begin at date of signing. The borrower only owes those funds disbursed on the project, any undisbursed funds are returned to principal.

Loan Commitment Terms

Upon approval, the City of Bellingham, Home Rehabilitation Loan Review Board reserves the right to cancel the commitment or terminate the loan under the following conditions:

- After 60 days from signing the promissory note and deed of trust, or 60 days from issuing "notice to proceed" for a contract, the Borrower or contractor fails to

commence work on the project, unless the period is extended by the Housing & Services Program Manager.

- The Borrower or the Contractor cease work for more than forty-five (45) days, unless an extension has been approved in writing, or fails or refuses to complete the improvements within a reasonable time, as determined by the Housing & Services Program Manager.
- The Borrower changes or terminates the Rehabilitation Contract or enters into another contract for work on the property, without prior written approval of the Housing & Services Program Manager.
- The Borrower does not follow the dispute resolution procedure provided under the Rehabilitation Contract (or to litigation, if applicable) when inspection indicates that the work in dispute was done in accordance with the Rehabilitation Contract.
- All Borrowers pass away or become legally incapacitated, or otherwise become legally unable to act prior to the completion of the improvement.
- The Borrower abandons the property, or fails to facilitate necessary access to the property.
- Any interest in the property is sold or transferred prior to the completion of the improvements (as evidenced by the Home Rehabilitation execution of a Certification of Final Inspection) without the Housing & Services Program Manager's prior written consent, except for (a) the creation of a lien or encumbrance subordinate to the Mortgage, (b) the creation of a security interest for household appliances.
- The loan review board commitment is subject to completion of an environmental review by the city. The approval letter does not constitute a commitment of funds or site approval. Such commitment of funds or approval may occur only upon satisfactory completion of an environmental review under 24 CFR § 58 and receipt, as appropriate, by the city of a release of funds from the U.S. Department of Housing and Urban Development. The provision of any funds for this project is further conditioned on the city's determination to proceed with, modify, or cancel the project based on the results of a subsequent environmental review.

Displacement

It is the policy of the City of Bellingham not to fund rehabilitation projects that will result in the displacement of low or moderate-income tenants. The LRB must grant any exception to this policy. If there were an exception made by the LRB, the City of Bellingham will follow the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970 (URA) (42 U.S.C. 4201-4655) and 49 CFR § 24.

A displaced person is defined as a person who is required to move permanently and involuntarily as a direct result of a rehabilitation activity. Further explanation of the displacement policy is available upon request.

Temporary Relocation Policy

Recipients of Home Rehab Program Deferred Payment and Subsidized loans who must be temporarily relocated during the rehabilitation process may be eligible to have temporary housing paid with program funds. A copy of the Temporary Relocation Policy is available upon request.

Grievance Procedure

You have a right to appeal the decision of the Loan Review Board, or an action taken by a program staff member. A copy of the appeal process is available upon request.

Subordination Policy

The City of Bellingham requires subordination requests to comply with the Policy for Review of Subordination Request Guidelines, available upon request.

**2018 INCOME TABLE
 Bellingham MSA (Whatcom County)
 Median Income \$68,300**

Maximum Annual Gross Income

Household Size	1	2	3	4	5	6	7	8+
Moderate income (≤ 80%)	\$42,650	\$48,750	\$54,850	\$60,900	\$65,800	\$70,650	\$75,550	\$80,400
Low income 60% AMI	\$31,980	\$36,540	\$41,100	\$45,660	\$49,320	\$52,980	\$56,640	\$60,300

Appendix A. In-Home Childcare applicant guidelines

All applicants who are in the process of starting a new in-home childcare business must follow the process outlined below in order to go through the Home Rehabilitation Program and obtain their family home childcare license concurrently. Applicants who are already licensed and operating an in-home childcare do not need to follow this process, and can contact the City directly (step 2). Regardless of whether the applicant is a new or existing childcare provider, if awarded a loan they will be subject to the loan commitment terms and the program requirements contained herein.

Process for new childcare providers:

1. The applicant must view the online family home childcare provider licensing orientation, and print out the post-orientation questionnaire (*as required by the Department of Children, Youth, and Families (DCYF)*).
2. The applicant must complete the City of Bellingham's Home Rehabilitation Program Waiting List Application, after which the City will determine the applicant's financial eligibility. Call Lisa Manos at 360-778-8391 for an application.
3. If deemed eligible, the applicant must contact Childcare Aware of NW Washington at 360-734-8396 (ext. 227) to schedule a walkthrough of their home.
 - a. A representative from either Childcare Aware or the Imagine Institute will come to the applicant's home and conduct a walkthrough. The representative will generate a list of rehabilitation work that is necessary to be in compliance with the State's most current home childcare's physical and structural requirements. A staff member from the City of Bellingham may attend this walkthrough as well.
 - b. The Childcare Aware/Imagine Institute representative will share a copy of the list of home rehabilitation needs with the City of Bellingham, along with a letter of acknowledgement that they believe the applicant to be a good candidate for the Home Rehab Program.
4. After completing the online orientation and walkthrough, the applicant must call their local DCYF Office to schedule an in-person orientation (*as required by DCYF*).
 - a. The applicant must bring their completed application and necessary supporting documents to the appointment. The applicant should include a note stating that they are planning to apply for Home Rehabilitation Program loan through the City of Bellingham.
 - b. DCYF has 90 days to approve or deny an application. If home improvements are still in process after 90 days, the applicant can turn in a new child care license application.
5. Once the application is processed, a DCYF licensor will do a site visit at the applicant's home for final inspection. This should be scheduled only after the list of

rehab needs generated by the Childcare Aware/Imagine Institute representative are complete.

6. After the inspection, DCYF will write a compliance agreement. This agreement will be signed by the licensor and the applicant, then sent to the City of Bellingham.

Program requirements:

If awarded a home rehabilitation loan for the purpose of starting or expanding an in-home family childcare business, the applicant will be responsible for satisfying the following requirements, in addition to the participation requirements described in the “Eligibility Criteria” section of this document.

1. Enroll and participate in the Early Achievers program for a period of five years.
2. Accept children from families who are paying with childcare assistance vouchers, per the requirements of the Early Achievers program.
3. Ask all families to complete a confidential household income verification form (this form will be provided), and submit an annual report to the City of Bellingham.
4. Ensure that, on average over the course of a year, 51% of the children enrolled in the home childcare program are from families at or below 80% of the area median income (as indicated on the household income verification form).
5. Maintain appropriate client verification records, and consent to an audit by the City of Bellingham with 2 weeks advance notice.

Appendix B. Adult Family Home applicant guidelines

All applicants who are in the process of starting a new adult family home must follow the process outlined below in order to go through the Home Rehabilitation Program and obtain their adult family home license concurrently. Applicants who are already licensed and operating an adult family home do not need to follow this process, and can contact the City directly (step 4). Regardless of whether the applicant is a new or existing home care provider, if awarded a loan they will be subject to the program's loan commitment terms and the program requirements described herein.

Process for new adult family home providers:

1. The applicant must register for and have completed a Department of Social and Health Services (DSHS) prospective provider orientation.
2. The applicant must be referred to the City by DSHS's Home & Community Services department. An email introduction is sufficient.
3. The applicant must be enrolled in (or have completed) the AFH Administrator's course.
4. The applicant must complete the City of Bellingham's Home Rehabilitation Program Waiting List Application, after which the City will determine the applicant's financial eligibility. Call Lisa Manos at 360-778-8391 for an application. Applicants must submit a certificate of course completion and/or proof of enrollment along with their application.
5. If the applicant is deemed eligible, they will be placed on the waiting list and proceed along the normal Home Rehab Loan program process. Note that this process may take up to 6 months once an application is accepted.
6. It is the applicant's responsibility to ensure that they meet all DSHS and Washington State requirements and obtain their Adult Family Home license within 6 months of the completion of work.

Program requirements:

If awarded a home rehabilitation loan for the purpose of starting or expanding an adult family home, the applicant will be responsible for satisfying the following requirements, in addition to the participation requirements described in the "Eligibility Criteria" section of this document.

1. Meet all licensing criteria and ongoing requirements under Washington State law.
2. Accept Medicaid recipients as residents and track how many residents are Medicaid recipients on a monthly basis.

3. Ensure that, on average over the course of a year, 51% of the residents⁸ of the home are low income or Medicaid recipients, and submit an annual report to the City of Bellingham.
4. Maintain appropriate client verification records and agree to be audited by the City of Bellingham with 2 weeks advance notice.

⁸ This includes AFH client residents as well as the homeowner household.