



CITY OF WEST HOLLYWOOD

Inclusionary Rental Housing Program Guidelines

Owners and Applicants

Updated
March 2023

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1.1 Introduction

This document describes the City¹ of West Hollywood's Program for Inclusionary Rental Housing Applicants ("Program Guidelines"). The Inclusionary Rental Housing Program ("Program"), adopted by the West Hollywood City Council on May 1, 1986 and deemed effective on June 1, 1986, is based on Chapter 19.22 of the West Hollywood Municipal Code. These Program Guidelines reflect periodic updates by the City Council to the prioritization of eligibility for inclusionary units.

Inclusionary Housing is a land use tool utilized to provide affordable housing. "Inclusionary" can be defined as a mandatory requirement to reserve a specific percentage of housing units for lower income households in new residential developments. The affordable units are expected to be dispersed throughout the development in order to generate a mix of income levels within residential areas and offer access to public and commercial services regardless of economic status and income levels.

The following Program Guidelines are designed to provide information to prospective Program applicants. Some situations may arise that are not covered in these Program Guidelines. In those cases, please contact the Rent Stabilization Division.

For property owners, landlords and property management companies, these Program Guidelines do not take precedence over the Agreement Imposing Restrictions on Real Property ("Agreement") or any project conditions of approval. Should there be any conflict between the Program Guidelines and the Agreement or project conditions, the Agreement and project conditions supersede and prevail over any conflicting statement in these Program Guidelines.

Questions about Program administration or Program Guidelines should be directed to the Rent Stabilization Division at 323-848-6450 or rsd@weho.org.

1.2 Non-Discrimination Policy

The City and/or the Rental Agent² will not engage in an activity prohibited by federal, state, or local law which prohibits housing discrimination on any basis including but not limited to sexual orientation, race, color, sex, ancestry, ethnic origin, national origin, religion, age, marital status, familial status, parenthood, pregnancy or pregnancy-related condition, disability, medical condition including, but not limited to, AIDS or AIDS-related conditions, gender identity, occupancy by a minor child, citizenship, political affiliation or opinion, source of income, or any other arbitrary basis.

No criteria will be applied or information considered, pertaining to attribute or behavior that may be imputed by some to a particular group or category. All criteria shall be applied equitably, and all information considered regarding an applicant shall be related solely to the attributes and behavior of individual household members as they may affect residency.

¹ When the City is referred to throughout these Program Guidelines, it also refers to any designated Program administrator.

² When the Rental Agent is referred to throughout these Program Guidelines, it refers to any person or entity authorized to offer an inclusionary unit for lease to a qualified applicant under the requirements of these Program Guidelines or Agreement.

1.3 City's Inclusionary Program and Fair Housing

The City and the Rental Agent will comply with all federal, state, and local fair housing and civil rights laws and with all equal opportunity requirements.

The Office of Fair Housing and Equal Opportunity (FHEO) of HUD³ enforces the Fair Housing Act and other civil rights authorities that prohibit discrimination in the sale, rental, or financing of dwellings because of race, color, national origin, religion, sex, familial status (families with children under the age of 18) or handicap (disability). For more information, contact the California FHEO office at:

San Francisco Regional Office of FHEO
U.S. Department of Housing and Urban Development
600 Harrison Street, 3rd Floor
San Francisco, California 94107-1387
(415) 489-6524
1-800-347-3739
TTY (415) 436-6594

If a constituent wishes to file a complaint, they should access the HUD website at: https://portal.hud.gov/hudportal/HUD?src=/topics/housing_discrimination or call (800) 669-9777.

Program eligibility and waiting list priorities adhere to the City Council's resolutions, as found in Appendix A. If a constituent has a complaint regarding the administration of the Program, they should submit the complaint in writing to:

Rent Stabilization Manager
City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA 90069

Alternatively, complainants may contact administrative support staff at (323) 848-6450 or rsd@weho.org.

1.4 Suspicion of Fraud or Criminal Activity

Program fraud/criminal activity, such as unauthorized person(s) living in the rental unit, unreported family income or assets, and criminal or unlawful drug activity, are violations of program rules, and they damage the integrity of the Program. If someone suspects fraud or unlawful activity, they should contact Rent Stabilization Division staff at (323) 848-6450 or rsd@weho.org.

If preferred, a complaint may be filed by sending a letter anonymously to the attention of the Manager of the Rent Stabilization Division at:

City of West Hollywood
8300 Santa Monica Blvd.
West Hollywood, CA 90069

³ "HUD" is the U.S. Department of Housing and Urban Development

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The complaint should provide as much information as possible about the issues, person(s) involved, and the activity. The City will investigate all reports. Due to the need to maintain confidentiality, however, the City cannot update a complainant or provide information on outcomes of any investigation.

Any households found to have committed fraud or other violations of Program requirements following investigation, including making false, incomplete, or misleading statements, will be terminated from the Program and will no longer be eligible for future participation.

2 Applying for Inclusionary Units

2.1 What is the City of West Hollywood Inclusionary Rental Housing Program?

The City of West Hollywood administers an Inclusionary Rental Housing Program where a percentage of dwelling units are made available as rental apartments for very low, low, and moderate-income households. The affordable units are generally dispersed throughout the development and in many cases are identical to market-rate units.

2.1.1 Definition of Income Categories

The following definitions refer to the income categories utilized to determine applicant eligibility for the Program:⁴

Very Low-Income – A very low-income person or household has annual income up to fifty percent (50%) of the median income.

Low-Income – A low-income person or household has an income that is \$1 above fifty percent (50%) and up to eighty percent (80%) of the median income.

Moderate-Income – A moderate-income person or household has an annual income that is \$1 above eighty percent (80%) and up to one hundred percent (100%) of the median income.

Income categories are adjusted by household size, which is taken as the total number of persons occupying a unit. The calculation of income limits is based on HUD's annual published limits.

2.2 Waitlist of Interested Participants

The City of West Hollywood maintains a waitlist of interested participants who have registered for the very low, low, and moderate-income housing categories. The waitlist is managed by HouseKeys, which administers home ownership, rental, and financing programs for the City and several other California municipalities. HouseKeys may act as City's agent for any actions set forth in these Program Guidelines. Information regarding HouseKeys and the City's waitlist can be found at www.housekeys.org.

2.2.1 One Category at a Time

Interested parties can register for one income category at a time, i.e. very low-income, low-income, or moderate-income housing units.

2.2.2 Waitlist Registration

Interested parties to be listed on the waitlist will be required to complete the waitlist registration form, provided the Program's waitlist is open.

The registration form requests an interested party's source and amount of income, assets and additional information related to employment, disability or retirement, pension, or other sources of income.

Please note the wait time for a Program rental unit is based on availability and cannot be estimated.

⁴ Other limits may apply as designated in a specific project agreement, including but not limited to projects designated "Workforce Housing".

2.2.3 Waitlist Procedures

The Program waitlist, which is opened periodically at the City's discretion, is a list of households that have completed registration indicating that they are interested in participating in the Program and have submitted information about their household size and household income. Initial registration information assists in determining eligibility for very low-, low-, or moderate-income inclusionary housing units. At the time of registration, in general, an interested party's information is not verified. NOTE: Households that own real estate will not qualify for the program.

An interested party's place on the waitlist is determined by the date on which the completed registration is received and/or a lottery system; however, acceptance to the waitlist does not automatically guarantee eligibility for a housing opportunity.

When an interested party is added to the waitlist, they may expect the following next steps:

1. The interested party's name will be placed on the waitlist in an order determined by lottery, provided the application was received before the application period ends. The City retains discretion to open and close the waitlist depending on factors including but not limited to number of eligible, current waitlist candidates and anticipated or actual housing stock availability. Following placement on the waitlist, determinations on specific housing opportunities may be impacted by City Council directed priorities (see Section 2.6 Application Priority below).
2. The interested party will receive confirmation that they have been placed on the waitlist. The interested party should keep this confirmation for their records.
3. When a unit becomes available, the inclusionary housing unit's Rental Agent is provided a list of interested parties in the order they appear on the waitlist. The Rental Agent will contact each interested party to provide information regarding the inclusionary unit.
4. If the interested party declines two offers for available units, absent a qualifying disability, they will be deemed 'inactive' and will not receive any invitations for future housing opportunities.
5. The interested party should be prepared with credit information, rental history and other pertinent information for a rental application. The Rental Agent makes a decision based on criteria such as credit and rental history.
6. If Rental Agent's criteria are not met, the interested party will maintain their place on the waitlist for one additional attempt. If all Rental Agent's criteria are met, applicant will then be processed for approval based on the City income eligibility requirements.
7. Upon review of all household income and asset documentation, eligibility will be determined. If denied, one attempt will be made to notify the applicant directly based on the applicant's chosen means of communication. If approved, the Rental Agent will notify and contact the applicant to move forward with the leasing process.

Applicants offered a rental unit will have 24 hours from receipt of the phone call or email to notify the Rental Agent of their intention to accept or reject the offered rental unit. Any deviation from this time frame must be approved in writing by the Director of Human Services & Rent Stabilization. Exceptions such as medical emergency or a death in the family, would be considered for offering an extended response time, except that such response time will not exceed one week.

Exceptions will be made for households receiving Section 8 assistance, since their out-of-pocket rent would be identical and the inclusionary units may have features and amenities not available in their current units, and for households seeking more bedrooms than their current unit provides. It is important to note that current West Hollywood residents who are being displaced from their

units for any reason other than just-cause eviction will continue to get the highest priority for available inclusionary units.

2.2.4 Removal from List – Declining a Housing Offer

If an applicant is accepted by a Rental Agent, and then turns down the offer for housing, the applicant and all members of the applicant's household will be removed from the list, with the reason listed as, "declined rental offer" on their file. The applicant will no longer receive notices of available housing. This rule applies to interested applicants who have been processed and offered a unit.

The only exception to being removed from the list would be those instances where an applicant turns down a rental offer because the applicant has established that a reasonable accommodation is required due to disability status. If an applicant fails to provide all needed information for the City to qualify for a reasonable accommodation, the applicant this is considered to have turned down the offer. This rule applies to all applicants, including displaced households.

2.2.5 Re-Registration

Interested Parties will be required periodically to update household, contact or income information. If the interested party's contact information is not currently on the waitlist and they cannot be contacted, their name will be moved to the bottom of the waitlist. If the interested party is unable to be contacted after a second round of updates, their name will be removed from the waitlist.

2.2.6 Waitlist Closure

The City reserves the right to close the waitlist at its discretion. The City informs residents when the inclusionary housing waitlist is reopened through their website, local newspapers, local social service agencies, press releases, and/or the City cable channel.

2.3 Application Process

Once the interested party is contacted by the Rental Agent, they will be required to complete a rental application to be processed by the Rental Agent to verify that the initial criteria is met. Applicants' credit histories are verified by prospective landlords, not by the City. No inclusionary units shall be rented to households whose household annual gross income, including business income, exceeds the income levels established by the City Council. Final approval to rent an inclusionary unit rests with the City.

2.3.1 Application Approval Process

Upon determination by the Rental Agent that an applicant meets initial application requirements, the household will have 48 hours to provide the City with the required documentation of annual income and assets for the household as described under "Eligibility Requirements" (Section 2.4).

The City reserves the right to request additional documentation of income, assets, bank accounts, credit reports, and other information including background checks in order to approve the application. Failure to respond to this request will deem the application rejected.

Staff will notify applicants in writing if they do not meet specific income guidelines as defined by the West Hollywood City Council and these Program Guidelines. Applications will be rejected if they do not meet criteria listed in Section 2.4 Eligibility Requirements.

Applications will be rejected for reasons such as:

- a. Annual income that does not meet the required minimum or exceeds the allowable maximum;
- b. Inaccurate or false information on the application or on the income certification forms;
- c. Failure to disclose all sources of income;
- d. Failure to provide additional requested income or asset documentation;
- e. Household size that does not conform to the stated minimum and maximum sizes per prospective housing unit;
- f. A prior tenancy in the inclusionary program in which the tenant did not fulfill the obligations of the program (such as supplying annual recertification forms in a timely manner, that is, by the deadline, or, if requested in advance, within an extension of the deadline by thirty days.);
- g. Eviction from an inclusionary rental unit in the City's program. Prior tenants who were previously participants in the inclusionary program, and were evicted or disqualified from the program, shall not be eligible for the inclusionary waitlist;
- h. Blatantly disrespectful, disruptive, or anti-social behavior toward management, the property, or other residents exhibited by an applicant or household member any time prior to move-in (or demonstrable history of such behavior);
- i. Other good cause, including, but not limited to, failure to meet any of the resident selection criteria in the document.

2.3.2 Rejected Applications – Appeal Process

Applicants who are deemed not qualified for occupancy by the City may appeal the decision. The applicant shall have ten (10) business days from the date of the letter to respond in writing ("Appeal letter") only and shall provide a reason the applicant disagrees with the rejection of the application. The Appeal Letter shall be directed to Manager, Rent Stabilization, City of West Hollywood, 8300 Santa Monica Boulevard, West Hollywood, CA 90069. During the appeals process, the applicant will hold the next place in line unless or until the applicant is rejected.

2.4 Inclusionary Housing Program Eligibility Requirements

Eligibility for the Program is determined by the applicant's verified annual income and household size and the additional Program criteria as listed below.

While this Program is not governed by the U.S. Department of Housing and Urban Development (HUD), the City does recognize some guidelines for income eligibility as defined in HUD Regulation 24 CFR (Code of Federal Regulations) Part 5. A list of the Part 5 income "inclusions" and "exclusions" is published in the Code of Federal Regulations at 24 CFR 5.609. This list is periodically updated by HUD when changes are made to the Part 5 definition of annual income by the United States Congress.

2.4.1 Other Income

Under the Inclusionary Housing Program, funds voluntarily directed to retirement, deferred compensation, and other similar programs are included when determining household income.

2.4.2 Reporting on Assets

Applicants to the Inclusionary Housing Program are required to provide information on major assets, including the list below. Applicants will be required to explain all deposits over \$50.00. Applicants may also be required to provide backup documentation.

- Cash held in savings and checking accounts, safe deposit boxes, homes, etc.
- Revocable trust.
- Equity in real property or other capital investments.
- Stocks, bonds, Treasury bills, certificates of deposit, mutual funds, and money market accounts.
- Individual retirement, 401K, and Keogh accounts.
- Retirement and pension funds.
- Cash value of life insurance policies available to the individual before death.
- Personal property held as investment (including gems, jewelry, coin collections, or antique cars held as an investment; personal jewelry is not considered an asset).
- Lump sum receipts or one-time receipts.
- A mortgage or deed of trust held by an applicant.

Assets DO NOT include the following:

- Personal property (clothing, furniture, cars for transportation needs, including vehicles specially equipped for persons with disabilities, wedding ring, other jewelry that is not held as an investment).
- Interest in Indian land trust.
- Term life insurance policies.
- Assets that are not accessible to the applicant and provide no income to the applicant.

2.4.3 Income Restrictions

An eligible program participant must have an income that does not exceed the levels for each income category as established annually by the City Council. The income levels are based on West Hollywood's median income and are adjusted annually according to the Consumer Price Index (CPI) for All Wage Earners for the Los Angeles - Long Beach.

A tenant's right to continue to lease an inclusionary unit will be terminated if the tenant's annual gross income exceeds the maximum allowable income by more than fifty-percent (50%) for two (2) consecutive years.

Sample calculation: Applicable AMI x 1.5 = Annual Maximum Income Limit

For further detail, reference the Income Guideline Schedule.

If upon review of the annual compliance form, a household exceeds the income levels in a given year, staff will notify the tenant and the landlord. The tenant will then have thirty-five (35) calendar days after said written notice to vacate the premises so that the inclusionary unit may be made available to an eligible participant. If the gross income of all persons in the tenant's household decreases, such decrease shall not affect the tenant's right to occupy the inclusionary unit.

2.5 Privacy and Inclusionary Program Records

Privacy laws prevent staff from releasing information to anyone other than the applicant directly.

2.6 Application Priority

The City Council establishes the waitlist priorities. Priority is given to eligible program applicants based on the following conditions according to the City Council resolutions in Appendix A:

1. Current West Hollywood residents.
2. Senior and disabled households, including those with HIV/AIDS.

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3. Persons who have been displaced by removal of the unit from the rental market.⁵
4. Households that are rent-burdened, defined as rent being more than 50 percent of gross household income.
5. People living in over-crowded quarters, defined as more than two persons per bedroom.
6. Persons currently working within the City.
7. Households whose current rent significantly exceeds inclusionary rent and who have declined units on more than one occasion.

⁵ Income qualifying West Hollywood residents who have been served with notice to vacate for a no-fault reason under West Hollywood Municipal Code Section 17.52.010 (e.g., Ellis Act eviction) may apply to the City for priority placement on the Program waitlist prior to vacating the premises.

3 Occupying the Units

3.1 Tenant Selection

Developers, owners and/or managing agents of inclusionary housing units are required to notify the City of inclusionary housing vacancies and are required to select tenants from among the waitlist pool. Based on the unit size, the City refers 3-5 interested parties (or more) per available unit to the appropriate managing agent for tenant selection. The Rental Agent will be responsible for obtaining any additional information (i.e. former residences and credit histories) required for selecting tenants. The City also notifies the interested parties that they will be contacted by the Rental Agent regarding an inclusionary unit.

The City makes every effort to educate prospective tenants that merely being on the waitlist and receiving a letter does not guarantee they will receive an inclusionary unit. The process requires each applicant to meet the screening property's criteria, such as rental and credit history. Prospective tenants with credit issues should be ready to present any alternative documentation, such as a letter from their current landlord, printouts from the utility companies of a good payment history and, if a medical issue caused the credit report damage, perhaps a letter from a social worker documenting that the family is a good candidate.

In its correspondence to the managing agent, the City includes this language:

“Here is a list of interested parties for tenancy in your inclusionary units. Please remember that these are names of people who have been in need of inclusionary housing for many years and have patiently been waiting on the City's waitlist.

We would like to inform you that inclusionary tenants may not have a traditional credit score due to their lower income qualification. However, there are other ways for them to demonstrate creditworthiness such as long-term timely payment of rent and utilities at their current or prior residences. We encourage you to call for references on this next group of referrals for that information.”

Applicants who are rejected due to poor credit or prior evictions are advised to contact the credit reporting agency that may have provided the information. Also, for assistance with credit repair, applicants will be encouraged to contact the Department of Consumer Affairs, Los Angeles County, and to speak with one of their counselors at (800) 593-8222 or online at: <https://dcba.lacounty.gov/portfolio/improving-your-credit-record/>

3.2 Initial Rental Rates

Rental rates are established annually by City Council Resolution and set forth in Schedule A and Schedule B of the annual Resolution, which become effective on September 1 of each year.

3.3 Section 8

Notwithstanding the foregoing, if a subsidy program under Section 8 of the Housing Act of 1937, as amended, or any other comparable subsidy program, is available to the Owner, then the Owner may rent the affordable units to persons qualified for the program at a rental rate established by and permitted under said program as defined by the United States Department of Housing and Urban Development (HUD), as adjusted for household size. However, the tenant's portion of the rent may not exceed the maximum rental rate as established per Section 3.2.

3.4 Annual Rent Limits

Inclusionary housing rent and income levels are adjusted on an annual basis based on the CPI and at the discretion of the City Council. The rent limits are provided annually to allow sufficient time to notify owners and tenants of any increases. The increases are effective on September 1 of each year.

3.5 Occupancy Standards

Maximum and minimum occupancy standards are set so that the occupied unit is neither overcrowded nor underutilized. Unless the Agreement Imposing Restrictions on Real Property specifies otherwise, the following occupancy standards apply:

1. Minimum occupancy: Potential tenants will not be eligible for a vacant inclusionary unit if the anticipated occupancy is less than one person per bedroom. One person shall be eligible for an inclusionary unit not larger than one bedroom. Occupancy and household size will be reviewed at the time of application.
2. Maximum occupancy: For all inclusionary units assisted under the HUD Section 8 Housing Assistance Program, or any replacement program, federal regulations currently require that no more than two persons may occupy one bedroom, and children of the opposite sex over age five may not be in the same bedroom. If HUD guidelines permit, tenants may use the inclusionary unit's living room as a sleeping area for one person, depending on the configuration of the living room or family circumstance.

For all inclusionary units that are not part of the Section 8 Housing Assistance Program, no more than two persons per bedroom may occupy an inclusionary unit, plus one additional person per household for the living room. Using this method, the maximum number of persons permitted to occupy a one-bedroom inclusionary unit will be no more than three; a two-bedroom inclusionary unit no more than five, and so on.

3.5.1 Live-In Aids

The City will approve a live-in aide if needed as a reasonable accommodation for a disabled resident in the household. A household that consists of one or more disabled persons may request that the City approve a live-in aide to reside in the unit and provide necessary support services for the household member who is a person with disabilities.

The City:

- Will allow a live-in aide as reasonable accommodation if needed.
- May screen live-in aides as they screen other household members.
- May reject a particular individual as a live-in aide based on criminal acts and drug-related activity as well as previous evictions from another inclusionary unit within the City.
- Will exclude a live-in aide income when calculating the household's share of the rent.
- May allow a larger bedroom size unit to accommodate a live-in aide, if needed as a reasonable accommodation.
- May establish reasonable policies regarding live-in aides, such as what documentation is needed to approve a relative as a live-in aide.

3.6 Rental (Lease) Agreement

The City must approve the lease agreement that is to be signed by the owner or its agent and the Program participant. Each lease agreement shall be furnished to the City upon Rental Agent criteria being met. Owners are required to utilize or be in substantial compliance with clauses in

the City's approved model lease agreement as set forth in the respective Agreement Imposing Restrictions on Real Property or other condition of use.

3.7 Lease Clauses

Each specific property in the inclusionary program has an Agreement Imposing Restrictions on Real Property. The lease clauses are in the Agreement as a section entitled:

CITY OF WEST HOLLYWOOD
AMENDMENT TO THE LEASE
(Controlled Unit)

Each Agreement Imposing Restrictions on Real Property is negotiated with the property owner and may contain clauses unique to the specific property.

3.8 Security Deposit

The security deposit amount is in the lease clauses as required by the Agreement Imposing Restrictions on Real Property. Some agreements have a security deposit clause, some do not.

For those Agreements that do not specify the security deposit amount, the security deposit shall be governed by state law. Provisions in the Rent Stabilization Ordinance regarding security deposits do not apply to inclusionary units and are governed by state law or the amounts set forth in the respective Agreement Imposing Restrictions on Real Property or other condition of use.

3.9 Verification of Compliance - Owner

Commencing one year after the issuance of the final approval of completion and every year thereafter, the owner is required to submit a report stating the current rent level, whether the occupant(s) are assisted by a program under Section 8 program, the number of occupants in the household, and whether there have been any changes in the composition of the household during the reporting year. Forms are mailed to the owner or managing agent along with a letter explaining that the forms are part of an annual compliance review.

The City confirms that all forms are received, filled in completely, rent is at the allowable level, tenant information is accurate, and that the City has copies of all inclusionary unit leases. The City will follow-up with the owner or property manager regarding any unresolved issues or incomplete information.

3.10 Verification of Compliance – Tenant

Documents such as the lease agreement, tax forms, bank statements, and pay stubs may be requested by the City to verify that only listed and authorized tenants are living in the inclusionary unit. Submitted documents must include the tenant address. In addition, the City may require a statement signed under penalty of perjury certifying that no unauthorized person lives in the inclusionary unit.