



The Housing Authority of New (HANO) Criminal Background Screening Policy: Assessment of Risk and Individualized Review

Why screen for criminal background?

- Provide a safe, peaceful, and enjoyable community for our residents
- Assessment of risk of potential tenants
- Assumption that past actions can predict future behavior
- Assumption that criminal activity = high risk

Criminal Background Screening: Traditional vs. New

- Traditional
 - Blanket bans
 - Standard look-back periods for all convictions
 - Denial based on any convictions during look-back periods
 - Right to informal review of denial
 - Consideration of mitigating circumstances

Criminal Background Screening: Traditional vs. New

- New
 - HUD-mandated bans
 - Look-back periods based on type of conviction, chance of recidivism
 - Individualized review of certain convictions of concern – *prior* to any denial
 - Look at the totality of the circumstances
 - Consideration of mitigating circumstances
 - Right to informal review of denial

HANO Criminal Background Screening Policy

Two Step Process:

1. Assess any criminal convictions using “the Grid”: categories of crimes and look-back periods for which further review is required
2. Conduct individualized assessment for applicants whose convictions require further review

Note: if a criminal conviction does not trigger a further review, the applicant is deemed admissible if otherwise eligible.

HANO Criminal Background Screening Policy

Screening Criteria Grid (sample)

Type	#	Crime Category	Subcategory	Further Review
Crimes Against Persons	1	Assault and Battery	Felony only	Further Review if within 3 years of conviction or 1 year of release from date of screening
	2	Misdemeanor Domestic Violence	All	Further Review 3 years of conviction or 1 year of release from date of screening
	3	Use of firearm against a person	All	Further Review
	4	Armed Robbery offenses	All	Further Review
	5	Robbery offenses, no weapon involved	All	Further Review if within 3 years of conviction or 1 year of release from date of screening



HANO Criminal Background Screening Policy

Further Review Process:

- Three person panel, consisting of two senior HANO officials and one resident representative
- The panel takes into account, at a minimum, the following factors in its decision-making:
 - Criminal History
 - Rehabilitation
 - Community Ties/Support
 - Employment History
- Panel Renders Decision

HANO Criminal Background Review Panel

Report: August 2016 thru August 2018

<u>Panel Review Requests</u>	<u>HCVP</u>	<u>PH</u>	<u>PBV</u>	<u>Grand Total</u>
Received	29	1	13	43
<u>Relation to HOH</u>	<u>HCVP</u>	<u>PH</u>	<u>PBV</u>	<u>Grand Total</u>
Head of Household	22	0	12	34
Addition to Household	6	0	1	7
Live-in-Aide	1	1	0	2
<u>Status</u>	<u>HCVP</u>	<u>PH</u>	<u>PBV</u>	<u>Grand Total</u>
Open	1	0	0	1
Closed	28	1	13	42
<u>Crime Category</u>	<u>HCVP</u>	<u>PH</u>	<u>PBV</u>	<u>Grand Total</u>
Crimes Against Person	20	1	9	30
Crimes Against Property	5	0	2	7
Crimes Against Society	4	0	2	6
<u>Panel's Decision</u>	<u>HCVP</u>	<u>PH</u>	<u>PBV</u>	<u>Grand Total</u>
Approved	25	0	13	38
Denied	1	0	0	1
Withdrawn	2	1	0	3



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HANO's Criminal Background Screening Procedures can be found at:

http://www.hano.org/home/agency_plans/2016%20CRIMINAL%20BACKGROUND%20PROCEDURES%20-%20FINAL.pdf

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