

# Council Use Permit Application – Social Service Facility

Crossroads, Inc. – 244 North Extension Road

CUP Case No. ZON 18-00361

July 30, 2018

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## Introduction

Crossroads, Inc. (“Crossroads”) is the owner of the approximate 3 acres of property located at 244 North Extension Road within the City of Mesa (“City”), also known as Maricopa County Assessor’s Parcel Number 135-55-013 (“Property”) as shown on the below [Aerial Map](#).

Crossroads is a State of Arizona (“State”) licensed non-profit outpatient and residential inpatient behavioral health care treatment provider that has been offering an array of clinical, educational, and community-based programs since 1960. Crossroads currently operates six different facilities in Mesa and Phoenix helping men and women affected by Substance Use Disorder (SUD). As the City has grown to be the third largest city in the State and as the greater Phoenix area becomes one of the largest cities in the United States, the need for social service facilities to help those affected by SUD has grown. The need for additional social service facilities has become apparent.

This application (“Application”) requests approval of a Council Use Permit (CUP) to allow a Social Service Facility for a behavioral health care treatment facility on the Property (“Proposed Facility”). **No detoxification** is proposed as part of this Application. A Special Use Permit has been submitted for concurrent review of a request for parking modification.

## Property Overview

The Property is located approximately 700 feet south of the southwest corner of Extension Road and University Drive. The Property is zoned RM-2 Multiple Residence (Ordinance No. 3250, Z96-73) and subject to a Special Use Permit (SUP) for an assisted living facility approved in 1996 (ZA96-142). The Mesa 2040 General Plan (“General Plan”) designates the Property as Neighborhood Suburban land use, which allows for a mix of residential uses and densities as well as limited commercial and services uses.

The Property has operated as an assisted living facility for more than 20 years up until Crossroads acquired it earlier this year. The Property is improved with a 32,017 square-foot single-story building, landscaping, large fully-enclosed courtyards, parking, and other associated site improvements. The Property is fully fenced, including block walls along the north, south, and west property lines and a wrought iron fence along the east property line adjacent to Extension Road. Access to the Property is provided via two gated driveways from Extension Road. Gates will be generally locked from 10 PM to 5 AM daily. An internal drive aisle provides vehicular access around the perimeter of the building with parking provided in the front and rear of the building. No exterior building or other site improvements requiring Site Plan, Design Review, and/or Substantial Conformance Improvement Permit (SCIP) approval are proposed.

Surrounding properties include a nearly 9-acre commercial/retail center to the north zoned Limited Commercial, existing single-residences to the east across Extension Road zoned RS-6 Single Residence, and condominiums (multiple-residences) to the south and west zoned RM-2.

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Aerial Map

### Crossroads Proposed Facility

Crossroads is proposing to operate their seventh – and second female-only – inpatient behavioral health care treatment facility on the Property. Crossroads' treatment programs are designed to empower clients to facilitate the change and growth necessary to succeed in treatment and in life. The proposed female-only Social Service Facility will follow Crossroads' programming model that has been successfully implemented for decades at their other locations.

Crossroads has long been a pioneer for helping women recover from SUD. Since opening their first female-only location in 2005, Crossroads has helped thousands of women regain their sobriety, families, children, and independence. Crossroads believes that every person deserves a chance to recover regardless of financial standing. Crossroads is the largest organization of its kind in the southwest that serves the underserved population.

There are no other similar female-only facilities within one mile of the Property. Existing social service facilities that do exist in the vicinity are depicted on the **Other Social Service Facilities Maps** provided at **Tab A**. There is a significant number of women suffering from SUD who have no access to treatment and/or are

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currently underserved in the City and greater Phoenix area. As such, there is a real need for this proposed Social Service Facility.

### Crossroads Programming Model

Crossroads' residential treatment programming consists of an intensive 24/7 clinically managed structure of daily living activities intended to address SUD. Following an off-site assessment and determination of appropriate treatment, most all clients are transported to the facility by a licensed transportation company, family member, or friend. On rare occasion, clients may drive themselves to the facility if they are determined to be sober and have valid driver's license, registration, and insurance. It is not desirable, however, for clients to leave their vehicle parked or stored on-site during their stay, since they are not permitted to leave the Property until properly discharged. For the few clients that choose to drive themselves to the facility, Crossroads will ask that they arrange to have a family member or friend pick up their vehicle and moved off-site.

Clients reside full-time on the premises during their treatment, which includes daily group education, weekly individual counseling, weekly discharge planning, accountability and therapeutic community service, ongoing 12-step facilitation therapy, assistance in the self-administration of medication, intensive case management, and discharge planning and care coordination. Treatment generally lasts an average of 45 to 90 days, followed either by a discharge plan or continued residency during transition to fully establish a foundation for independent living skills.

Common goals of treatment are to attain abstinence, learn to recognize and cope with triggers and cravings, manage post-acute withdrawal symptoms, develop a foundation of a daily living structure of activities conducive to a sober lifestyle, engage with 12 steps or other values that promotes recovery, establish a clinical after-care plan of ongoing services needed (mental health counseling, medication management services), learn the importance of adhering to treatment, develop a foundation of healthy social relationships, and establish a foundation for independent living skills (budgeting, employment, nutrition, job readiness, etc.).

Following treatment, clients may choose to remain at Crossroads for continued treatment services where they benefit from the ongoing support of the community in order to actively work on a solid transition plan for independent living. Clients at this stage are able to work and gain exposure to the principles of independent living, while still having access to the support of the therapeutic community. Clients' average length of stay for the continued treatment service phase varies from an additional 30 to 60 days.

Crossroads implements a Resident Discharge Policy that establishes policies and procedures for clients who have completed their inpatient treatment program. The purpose of the following policy is to ensure a smooth and safe transition from the facility into the next stage of the client's individualized treatment program:

*A Resident Discharge will be prepared for each resident as a way to ensure continuity of service.*

*a. Accommodating transportation needs:*

*i. Bus passes;*

*ii. Family; and*

*iii. Personal vehicle.*

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### *b. Referrals for treatment and ancillary services.*

The goal above all else is for clients to be successful in their treatment program and then transition into an independent lifestyle. Unfortunately, there are rare occurrences when an individual may choose to terminate treatment prior to completing the program. Crossroads has a policy in place to handle such occasions as clients are not permitted to come and go freely from the facility. In their continuing efforts to be a good neighbor, a staff member will securely escort the individual to a safe mode of transportation, such as a bus stop, to ensure that the individual does not wander into the neighborhoods.

Discharge planning is ongoing during the entire treatment cycle and aims to involve the client in developing a rationale for a final discharge from Crossroads. The discharge plan may include transition to a less intensive outpatient treatment provider or to a community living environment with no need for ongoing clinical support.

### **Crossroads Proposed Facility Operations**

In order to even be considered for admittance to the proposed Social Service Facility, individuals must: **complete detoxification at an off-site facility**, such as Community Bridges; be medically cleared, which includes an extensive mental and physical (drug and alcohol screening) health evaluation and exam, by a physician or licensed professional; and meet with a Crossroads admissions coordinator for evaluation and placement. Individuals under the influence at the time of admittance or at any time during treatment will be prohibited from entering or will be removed from the proposed Social Service Facility. Admitted clients are randomly tested, if not daily, for illegal substances and alcohol. Any violation of Crossroads' policies will result in discharge from the program.

The proposed Social Service Facility will be a secured, all-female, 102-bed behavioral health care treatment center. The proposed Social Service Facility will be staffed with one staff member for every 3 patients (1:3), 24 hours a day, 7 days a week to provide clients treatment and their families' encouragement, help and other resources to promote sobriety, strength and wellness, and positive and healthy relationships. During their stay, clients' schedules are strictly regimented and all activities are supervised. Day-to-day activities generally include breakfast, mid-morning treatment and rehabilitation classes and counseling, lunch, mid-afternoon treatment and rehabilitation classes and counseling, dinner, and nightly chores and other similar activities. To ensure a safe environment for all clients and Crossroads staff, intimate relationships or comradery is strictly prohibited.

Crossroads has also established an official position on emergency plans and procedures. (See **Tab B – Emergency Plans and Procedures**)

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### Compliance with CUP Approval Criteria in Section 11-70-6

A Social Service Facility is permitted in the RM-2 zoning district, subject to approval of a CUP. This Application has been prepared pursuant to Section 11-70-6 of the City Code, which requires the City Council find:

1. Approval of the proposed project will advance the goals and objectives of and is consistent with the policies of the General Plan and any other applicable City plan and/or policies.

**Response: Complies.** The General Plan designates the Property's land use as Neighborhood Suburban. The RM-2 zoning on the Property is consistent with the Neighborhood Suburban land use designation, which supports limited services uses, such as Social Service Facilities.

Specifically, this Application advances the following goal and objective from the General Plan related to social service facilities:

*It is also important that we do not have an over concentration of uses that require a conditional use permit in neighborhoods. These uses include group homes, social service agencies, and businesses that are typically considered incompatible with and detrimental to the surrounding neighborhood. General Plan Chapter, Section B.4.*

There are no other female-only inpatient residential SUD treatment facilities within one mile of the Property. In fact, the nearest female-only facility is the Women's Treatment Facility of Arizona located more than one mile beyond the proposed Social Services Facility. (See **Tab A – Other Social Service Facilities Maps**) Existing Social Service Facilities that do exist in the vicinity of the Proposed Facility include the following:

- a) Evolution Way, an outpatient treatment facility located at 724 West University Drive approximately 800 feet northeast of the Property across University Drive, performs assessments and diagnosis, in-take appointments, and short-term outpatient detoxification.
- b) Total Life Change Treatment Center, an outpatient treatment facility located at 32 South MacDonald Street, nearly 1-mile southeast of the Property. This facility is a religious-based treatment center offering short and long-term treatments for adults dealing with alcohol and drug abuse.
- c) Dana Center Halfway House, located more than ½-mile south of the Property, is a religious-based halfway house/facility providing counseling and transitional housing for recovering substance abusers.

Importantly, the General Plan recognizes that Social Service Facility uses are needed in the City for persons who are striving to get back to self-sufficiency and live as independently as possible. Crossroads has carefully considered this location for the proposed Social Service Facility, recognizing that it is possible to have supportive social services in the City, while avoiding an overconcentration of similar facilities in the area.

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Crossroads has long been a pioneer for helping women recover from substance use disorders. Since opening their first female location in 2005, Crossroads has helped thousands of women regain their families, children, self-dignity, and independence. Crossroads believes that every person deserves a chance to recover regardless of financial standing. Crossroads is the largest organization of its kind in the Southwest that serves the underserved population.

Crossroads is sensitive to its neighbors and is committed to providing the community and City with materials that inform the public about the need for this type of service and the rules and regulations governing its use, operation, and placement. (See **Tab C – Good Neighbor Policy**)

2. The location, size, design, and operating characteristics of the proposed project are consistent with the purposes of the district where it is located and conforms with the General Plan and any other applicable City plan or policies.

**Response: Complies.** The purpose of the RM zoning districts is to provide areas for multiple-residence housing, as well as to *“also provide for residential care facilities . . . limited and small-scale residential support activities . . . that are appropriate in a residential environment”*.

In 1996, the City Council found a Special Use Permit (SUP) for an assisted living facility on the Property was consistent with the RM-2 zoning district and within the mix of land uses (commercial, multiple-residence, and single-residence) that surrounded the Property at that time. The operating characteristics of the proposed Social Service Facility are nearly identical to the former assisted living facility, including being licensed by the State. Accordingly, the proposed Social Service Facility is consistent with the RM-2 zoning district, and is appropriate on the Property given the mix of surrounding land uses.

The proposed Social Service Facility is in conformance with and advances the goals and objectives of the General Plan and the Neighborhood Suburban land use designation. The RM-2 zoning on the Property is consistent with the Neighborhood Suburban land use, which supports limited services uses, such as Social Service Facilities.

Importantly, the existing building and site improvements have a residential appearance, including architecture, sizable setbacks, limited building height, abundant landscaping, fencing, appropriately located parking, and other perimeter improvements, consistent with the single-family residential character of the area to the east across Extension Road. No modifications are proposed to the exterior of the building or site that would alter the residential appearance or character of the Property.

The proposed Social Service Facility is also subject to the City’s Social Service Facilities Guidelines. Compliance with these “Social Service Facilities Guidelines” is addressed at **Tab D – Social Service Facility Guidelines**.

3. The proposed project will not be injurious or detrimental to the adjacent or surrounding properties in the area of the proposed project or improvements in the neighborhood or to the general welfare of the City.

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**Response: Complies.** Crossroads will operate the proposed Social Service Facility in a manner that will not interfere with the use and enjoyment of surrounding properties. Crossroads is sensitive to its neighbors and has adopted policies and acceptable measures to ensure ongoing compatibility with adjacent uses. (See **Tab C – Good Neighbor Policy**)

The assisted living facility, which generally provided residential care for persons of limited ability for self-care or other services, operated for more than 20 years on the Property with no known impacts on the surrounding mix of land uses. The proposed Social Service Facility will function and operate very similar to the former assisted living facility, including being licensed by the State, resulting in no injurious or detrimental impacts to the adjacent or surrounding properties.

Crossroads is one of the largest and oldest residential inpatient behavioral health care treatment providers in the southwestern United States, with proven expertise in serving those with SUD through the provision of high-quality, successful, and affordable outpatient and residential inpatient programs. Crossroads currently operates six State licensed facilities in Mesa and Phoenix. Of these six existing facilities, five are located within or adjacent to residentially zoned areas, similar to the proposed Social Service Facility at this location. Crossroads has successfully operated these facilities with no impact on adjacent properties or the general welfare of the cities in which they operate, and no complaints have been filed regarding any of their day-to-day operations. Crossroads will operate this proposed Social Service Facility in the same manner to ensure it will not be injurious or detrimental to the adjacent neighbors, surrounding properties, or to the general welfare of the City.

4. Adequate public services, public facilities and public infrastructure are available to serve the proposed project.

**Response: Complies.** The proposed Social Service Facility is nearly identical to the former assisted living facility that operated on the Property since 1996. Accordingly, adequate public services, public facilities and public infrastructure are available to service the proposed use.

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### Compliance with CUP Approval Criteria in Section 11-31-26 – Social Service Facility

This request has been prepared pursuant to Section 11-31-26 of the City Code, which requires the City Council find:

1. The use is found to be in compliance with the General Plan, Sub Area Plans and other recognized development plans or policies, including the Social Service Facility Guidelines and will be compatible with surrounding uses.

**Response: Complies.** As stated above, the proposed Social Service Facility is in conformance with and advances the goals and objectives of the General Plan. The General Plan designates the Property Neighborhood Suburban land use. The RM-2 zoning on the Property is consistent with the Neighborhood Suburban land use designation, which supports limited services uses, such as Social Service Facilities.

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Importantly, the General Plan recognizes that Social Service Facility uses are needed in the City for persons who are striving to get back to self-sufficiency and live as independently as possible. Crossroads has carefully considered this location for the proposed Social Service Facility, recognizing that it is possible to have supportive social services in the City and avoid an overconcentration of similar facilities in the area.

Compliance with the City’s “Social Service Facilities Guidelines” is addressed at **Tab D – Social Service Facility Guidelines**.

2. A finding that a plan of operation has been submitted, which includes, but is not limited to, acceptable evidence of compliance with all zoning, building, and fire safety regulations.

**Response: Complies.** Approval of this Application will allow Crossroads to operate the proposed Social Service Facility in compliance with all applicable City zoning regulations. Crossroads will comply with all applicable building and fire safety regulations. Plans for improvements requiring a building permit will be submitted to the City for review and approval. Additionally, Crossroads will comply with all applicable State licensing requirements.

3. A finding that a "good neighbor policy" in narrative form has been submitted, which includes, but is not limited to, descriptions of acceptable measures to ensure ongoing compatibility with adjacent uses. Such policies shall include, but are not limited to, the name and telephone number of the manager or person responsible for the operation of the facility; complaint response procedures, including investigation, remedial action, and follow-up; and litter control measures.

**Response: Complies.** Crossroads’ “Good Neighbor Policy” is provided at **Tab C – Good Neighbor Policy**.

4. Evidence that acceptable documentation is present demonstrating that the building or site proposed for the use is in, or will be brought into, substantial conformance with all current City Development Standards, including, but not limited to, landscaping, parking, screen walls, signage, and design guidelines.

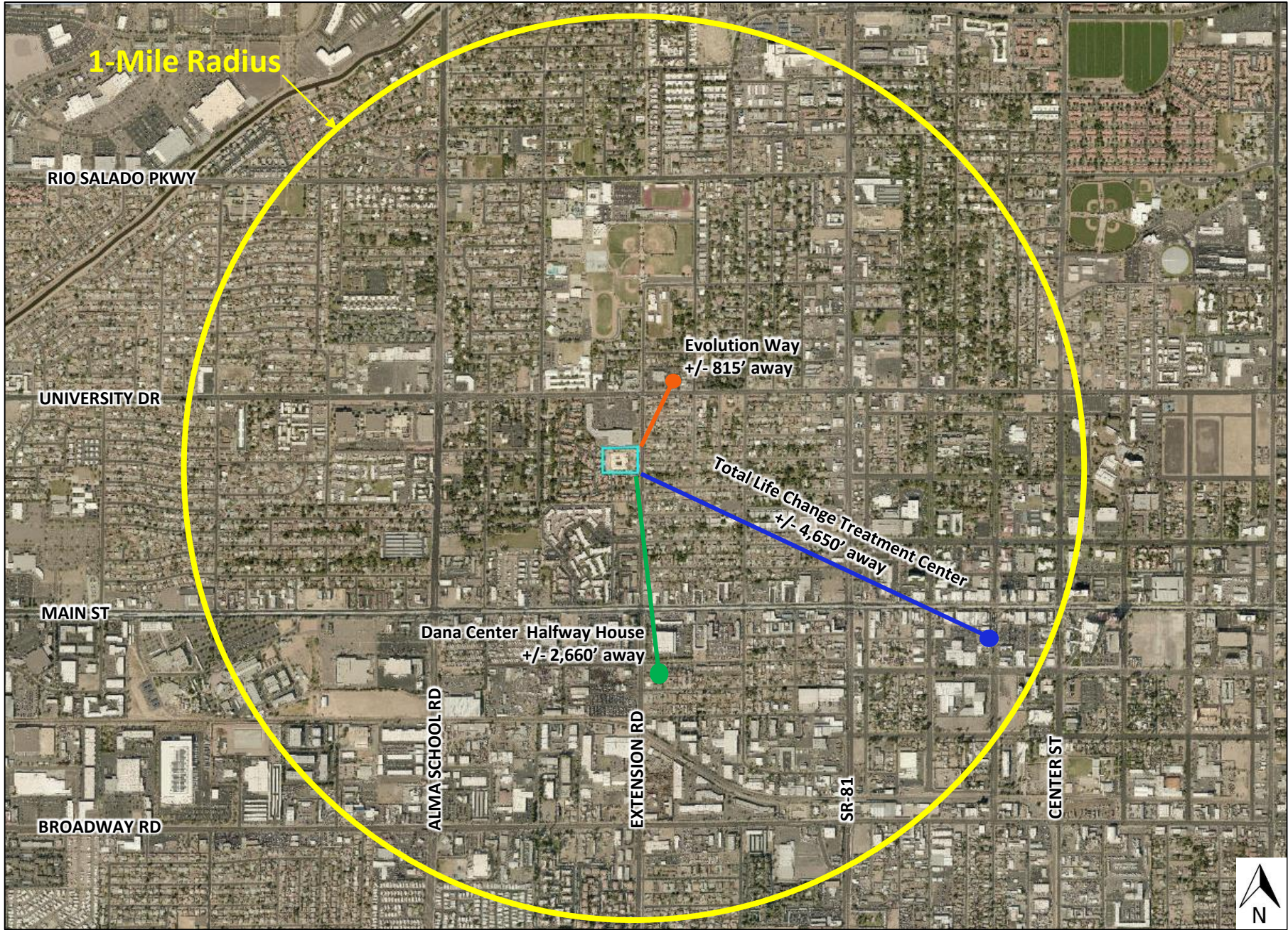
**Response: Complies.** No exterior building or other site improvements requiring Site Plan, Design Review, and/or SCIP approval are proposed. A Special Use Permit has been submitted for concurrent review of a request for parking modification.

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This Application to operate a Social Service Facility at 244 North Extension Road complies with all applicable approval criteria in the City Code and will provide for much needed inpatient behavioral health care treatment for women in Mesa and the greater Phoenix area.



TAB A – OTHER SUD TREATMENT FACILITIES WITHIN 1-MILE





**3-Mile Radius**

**Evolution Way**  
+/- 815' away

**Dana Center Halfway House**  
+/- 2,660' away

**Total Life Change Treatment Center**  
+/- 4,650' away

**Arizona Addiction Treatment Programs**  
+/- 1.8 Mi. away

**Canyon Vista Recovery Center**  
+/- 6,150' away

**East Valley Substance Abuse**  
+/- 2.9 Mi. away

**Women's Treatment Facility of Arizona**  
+/- 6,700' away

**River Source Treatment**  
+/- 7,050' away

**Arizona Bridge to Recovery**  
+/- 1.6 Mi. away



## **Tab B – Emergency Plans and Procedures**

Crossroads, Inc. – 244 North Extension Road

Pre-Submittal Case No.: PRS18-00190

April 30, 2018

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### **Emergency Plans and Procedures**

**PURPOSE:** To establish Crossroads' official position on emergency plans and procedures and to assign specific responsibility for implementation of the policy.

**POLICY:** As part of its commitment to providing a healthy and safe environment for residents, employees, and visitors, it is policy that emergency plans and procedures will be developed and implemented to address a variety of emergency situations.

**PROCEDURE:** The following general guidelines and procedures for emergencies apply at all Crossroads facilities:

1. Workplace Threats/Violence

a. Threats/ Violence

- In the event of workplace threats and violence such as hostage situations, individuals presenting with firearms/other weapons, etc., the following procedures apply:

- i. Employees will call 911 immediately for assistance and direction and if possible, stay on the line to keep communications open with authorities;
- ii. Employees in the immediate area will take steps to isolate the person, and calm him/her down without endangering residents, visitors, or other employees;
- iii. If de-escalation attempts are not successful, efforts will be made to move the individual from the immediate area (especially if there are other residents present or the environment is not safe);
- iv. Employees should position themselves closest to the door to facilitate a safe and quick exit;
- v. If a Program Coordinator or assistant is readily available, he/she will calmly attempt early intervention SATORI techniques, including verbal techniques;
- vi. Employees in charge shall direct others, as needed, to enhance the safety of the residents, visitors, and employees;
- vii. The employees in charge shall either notify, or direct other employees to notify, the Executive Director as soon as possible; and
- viii. An incident report shall be filed within 24 hours in accordance with policy.

## **Tab C – Good Neighbor Policy**

Crossroads, Inc. – 244 North Extension Road

Pre-Submittal Case No.: PRS18-00190

June 5, 2018

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### **Purpose**

The purpose of this Policy is to establish the Good Neighbor guidelines for all Crossroads' facilities.

### **Core Values**

Crossroads has been serving Arizona residents for over 50 years and currently operates six substance abuse treatment facilities in Phoenix and Mesa. Five of these six facilities are located in neighborhoods, one of which is located across the street from an elementary school. Crossroads is very sensitive to the surrounding neighbors. Crossroads will have staff available on-site 24 hours a day. At Crossroads, we:

- Honor and emphasize 12-step recovery programs in our services to residents and the community.
- Believe in the dignity and worth of all human beings and are committed to serving individuals towards living a life free of substance addiction.
- Are committed to delivering high quality, comprehensive, empathic, hopeful, effective, and affordable services tailored to the needs of those we serve and our community.
- Are committed to providing services that enable individuals to reintegrate into society with enhanced recovery, social, life, and emotional skills, and with the highest degree of self-sufficiency and self-worth.
- Are committed to being a good neighbor and serving the community by sharing our resources and providing services based on the values of 12-step recovery programs.
- Are committed to integrity, ethical practices, professionalism, and fiscal responsibility.
- Value relationships with alumni, donors, volunteers, colleagues, and community members.

### **Contact:**

Karem Garcia, Facility Manager

(Cell) 623-910-1523

(Office) 602-263-5242 x1510

(Email) [karem.garcia@thecrossroadsinc.org](mailto:karem.garcia@thecrossroadsinc.org)

### **Complaint Response Policy**

The following situations, conditions, and or circumstances may be reported to the Chief Compliance Officer and will be resolved accordingly:

- a. Lawn maintenance;
- b. Graffiti cover-up;
- c. Smoking outside of designated smoking areas;
- d. Excessive noise;
- e. Burnt-out parking lot or street lights; and
- f. Trash pick-up.

## **Tab C – Good Neighbor Policy**

Crossroads, Inc. – 244 North Extension Road

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The facility will be staffed with janitorial staff that will police any litter. All employees are responsible for conformance with this policy.

If any neighbor at any time wishes to voice a concern they will be given the contact information of the manager in charge and be offered an opportunity to meet with that person within 24 hours.

### **Incident Reporting Policy**

**PURPOSE:** To establish Crossroads' official policy on incident reporting and to assign specific responsibility for operational implementation of the policy.

**POLICY:** Accurate and timely reporting of significant events involving residents, employees, facilities, or community reputation and that occur either on or off Crossroads' premises is of paramount importance. It is policy that all significant events will be expeditiously reported to the Executive Director and to the Bureau of Residential Facilities Licensing (BRFL), as required.

**PROCEDURE:** The following procedures guide the incident reporting policy:

1. The following situations, conditions, and/or circumstances must be reported using an Incident Report Form under this policy:
  - a. Incidents involving restraint or injury;
  - b. Communicable diseases and infection control;
  - c. Violence or aggression;
  - d. Unauthorized absence of resident that has been court ordered to treatment;
  - e. Sentinel events (incidents involving death, injury, significant property destruction, etc.);
  - f. Vehicular accidents involving employees conducting official business on behalf of the organization;
  - g. Bio-hazardous accidents;
  - h. Actual incidents of suspected abuse, neglect, exploitation, or any violation of resident rights;
  - i. Accidents and injuries;
  - j. Medical emergencies;
  - k. Behavioral and psychiatric emergencies;
  - l. Illegal or violent behavior;
  - m. Release of confidential information without resident consent;
  - n. Fire and other natural disasters;
  - o. The use of seclusion (which is a practice specifically prohibited by Crossroads)
  - p. Death of an active resident/participant (on or off program site); and
  - q. Other situations, conditions, or circumstances that are required by BRFL/AZDHS rules or regulations to be reported via the incident reporting system.

## **Tab C – Good Neighbor Policy**

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2. Incident reports will document:
  - a. What happened (detail of incidents);
  - b. How it happened (sequence of events);
  - c. When it happened (exact or approximate date and time);
  - d. Where it happened (exact or approximate location);
  - e. Individuals involved;
  - f. Action taken;
  - g. What happened to the resident; and
  - h. The time and date the report is written with all appropriate signatures.
3. Program Coordinators will immediately notify the Compliance Officer of significant incident and the Compliance Officer is responsible for determining:
  - a. Potential causes;
  - b. If the event represents part of an ongoing trend;
  - c. Actions for improvement;
  - d. Results of performance plans;
  - e. Necessary education and training for employees;
  - f. Prevention of recurrence; and
  - g. Compliance with internal and external reporting requirements.
4. Debriefings will follow all significant incident reports and will include all employees involved to:
  - a. Discuss the incident and its antecedents;
  - b. Identify any procedural and/or policy changes that need to be made to prevent a reoccurrence of the incident; and
  - c. To ensure that employees have an opportunity to discuss and disclose their feelings, emotions, and reactions to the incident.
5. BRFL will be notified of investigations regarding neglect, exploitation, or other violations of resident rights.
6. Actual incidents of suspected abuse, neglect, exploitation, or other violations of resident rights shall be reported accordingly in specified time frame:
  - a. Immediately, but no later than 24 hours of such notification by employees, a verbal report shall be made of all allegations by the Compliance Officer to BRFL;
  - b. If the allegation involves the Executive Director, it shall be reported directly to the Board and BRFL investigations department; and
  - c. The person who reported the incident will submit a written incident report to the Compliance Officer within 24 hours.
7. The Compliance Officer will submit a written report to BRFL within two (2) working days after receiving notification, and the report will include:
  - a. Name of the resident;
  - b. Name of person the allegations are against;
  - c. A copy of the incident report; and

## **Tab C – Good Neighbor Policy**

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- d. List of other individuals, organizations, and law enforcement officials notified regarding the incident.
- 8. The Compliance Officer will also notify the legal consentor, if applicable.
- 9. If the resident is the legal consentor, family and significant other(s) may be notified only if the resident gives written consent.
- 10. Crossroads will investigate all incident reports and take appropriate action unless otherwise directed by the BRFL Investigation Department.
- 11. Crossroads will:
  - a. Document investigations, result of actions, and keep the documentation in a secured central file;
  - b. Enforce policies and procedures; and
  - c. Provide appropriate sanctions for confirmed violations.
- 12. The following will be reported to BRFL investigation department immediately upon discovery:
  - a. Violation of laws;
  - b. Violation of rules;
  - c. Violation of employee's professional and ethical codes of conduct;
  - d. Fires and natural disasters;
  - e. Suicide attempt by an active resident or participant (on or off the program site);
  - f. Substantial disruption of program operation; and
  - g. Death of an active resident/participant (on or off the program site).

All employees are responsible for conformance with this policy.

## Tab D – Social Service Facility Guidelines

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### Compliance with General Policies for Social Service Facilities

- A. New social service facilities should be located in a manner consistent with existing zoning and land use. Over time, a social service facility location plan should be designed by and approved by, social service providers and the City Council.

**Response: Complies.** The proposed Social Service Facility is in conformance with and advances the goals and objectives of the General Plan and the Neighborhood Suburban land use designation. The RM-2 zoning on the Property is consistent with the Neighborhood Suburban land use, which supports limited services uses, such as Social Service Facilities.

In 1996, the City Council found a SUP for an assisted living facility for self-care or other services on the Property was consistent with the RM-2 zoning district and within the mix of land uses (commercial, multiple-residence, and single-residence) that surrounded the Property at that time. The assisted living facility operated for more than 20 years on the Property with no known impacts on the surrounding mix of land uses. The operating characteristics of the proposed Social Service Facility are nearly identical to the former assisted living facility, including being licensed by the State. As such, the proposed Social Service Facility is consistent with the existing zoning and land uses and surrounding land uses and zoning.

- B. Social service facilities should be designed in such a way as to provide patrons with basic amenities such as restrooms, drinking water, and seating areas.

**Response: Complies.** The proposed Social Service Facility will provide patrons with fully furnished units complete with restrooms and showers. In addition, the facility includes two existing internal fully-enclosed outdoor courtyards, a commercial kitchen and dining room, laundry facilities, community/training room, staff offices and conference rooms, as well as a play room for children to visit and spend quality time with their mothers to engage in private, comfortable meetings with Child Protective Services to assist with reunification.

- C. Proposed new services should be supportive of existing services and should avoid being duplicative of similar programs already in operation. There should also be administrative cooperation among existing service providers.

**Response: Complies.** The proposed facility is not duplicative of similar programs already in operation because it will provide gender-specific (female) residential substance abuse treatment services within this area of the City.

- D. In general, social services providing homeless shelters, charity dining facilities, and similar uses should not be located along Main Street in the DC zone.

**Response: Complies.** The proposed Social Service Facility is not considered a homeless shelter or a charity dining facility, and is not located along Main Street or within the Downtown Core zone.



## Tab D – Social Service Facility Guidelines

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### Compliance with Operational Guidelines for Social Service Facilities

- A. Shelters, charity dining facilities, and similar communal facilities should be operated in a manner which ensures that all guests are treated with dignity and are provided a sanitary, healthy, and safe environment.

**Response: Complies.** The proposed Social Service Facility will be operated in a manner which ensures that all guests are treated with dignity and are provided a sanitary, healthy, and safe environment, including obtaining and maintaining Arizona Department of Health Services Behavioral Health Facility licensure and compliance with all other State and City applicable laws and requirements.

- B. Shelters must provide information to the City on the hours of operation, number of beds to be provided, and at the time of application, whether this is a permanent or temporary location (e.g. indicate length of lease or property ownership).

**Response: Complies.** The proposed facility will be a permanent location that provides 100 beds for female clients. Crossroads is a 24-hour facility with a 1:3 staff client ratio. The site is fully fenced gates will be locked each day from 10 pm to 5 am.

- C. Shelters should be limited in size to contain no more than fifty (50) beds.

**Response: Complies.** The proposed Social Service Facility is not homeless shelter, rather it is a State-licensed, clinically managed SUD treatment facility for registered clients. As such, the proposed facility is will be appropriately staffed and operated to safely and effectively manage the proposed 100-beds.

- D. Shelters offering overnight sleeping facilities should provide at least thirty (30) sq. ft. of useable open space per each bed. When services will regularly be provided for children, at least forty (40) sq. ft. of open space per bed should be provided. This open space must be enclosed by appropriate screening such as a fence or landscaping.

**Response: Complies.** The proposed Social Service Facility will provide overnight sleeping facilities for its adult, female-only clients. The presence of children at the facility will be limited to pre-scheduled, supervised visitation with clients (parents). The Property includes two existing internal fully-enclosed courtyards,

The property is approximately 130,000 square feet (+/-3 acres) with a building footprint of approximately 32,000 square feet (25% lot coverage). The remaining lot area, approximately 98,000 square feet, is comprised of vehicular driveways, parking, and landscaped yards and courtyards. The usable on-site open space, therefore, exceeds the minimum 30 s.f./bed requirement, and because the site is fully fenced and gated, the proposed facility complies with this criteria.

- E. Shelters providing overnight sleeping facilities should contain restroom facilities meeting requirements set forth in Appendix C of the Uniform Plumbing Code, as amended (e.g. one (1) urinal for each twelve (12) men; one (1) toilet for each eight (8) women; one (1) toilet for each ten (10) men, etc.).

## Tab D – Social Service Facility Guidelines

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**Response: Complies.** The proposed Social Service Facility will comply with all applicable Uniform Building Code requirements.

- F. Facilities providing food at minimal or no cost, including charity dining services, must serve such meals within buildings or in enclosed courtyards or patio areas. When meals are served outside, screening must be provided through construction of a wall or landscaping around the eating area.

**Response: Complies.** The proposed facility will include a fully enclosed commercial kitchen and dining room. All meals prepared on-site will be served within buildings or enclosed courtyards or patios.

- G. Charity dining services and other facilities providing food at minimal or no cost must provide to the City a schedule and guidelines of their operations (including such things as days, hours, loitering control policy, and security provisions).

**Response: Complies.** Meals at the proposed Social Service Facility will generally be served daily from 6 AM to 8 AM, 11 AM to 1 PM, and 5 PM to 6 PM. Crossroads has established an Emergency Plans and Procedures. (See **Tab B – Emergency Plans and Procedures**). Additionally, Crossroads is committed to providing the City and the community with materials that inform the public about the rules and regulations that govern the facility's use and operation.

- H. Social service facilities, other than shelters, must provide handicapped-accessible restrooms on site, including lavatories, with at least one toilet for men and one for women. Such restrooms facilities must be available for use by guests for a period beginning one-half hour before food is served until one-half hour the posted closing time or the final meal is served, whichever is later.

**Response: Complies.** The proposed Social Service Facility will comply with all applicable ADA requirements, as well as restrooms facilities will be available for use by guests for a period beginning one-half hour before food is served until one-half hour the posted closing time or the final meal is served, whichever is later.

- I. Shelters providing overnight sleeping facilities for stays of more than one (1) night must provide secure storage for guests' personal property such as sleeping bags and suitcases.

**Response: Complies.** The proposed Social Service Facility will provide individual locked storage for residents' personal possessions.

- J. Facilities which frequently have people waiting outside for services must provide an adequate waiting area which must be screened by a fence or landscaping.

**Response: Complies.** The proposed Social Service Facility will not have people waiting outside for services. The waiting area for incoming residents and visitors will be located within the building.

- K. Facilities providing food or drink in disposable containers or which use disposable utensils should provide at least one trash container of not less than thirty (30) gallons for each fifty (50) meals served. Such trash containers must also gather litter within seventy-five (75) feet of all entrances and exits to the facility after each meal.

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**Response: Not applicable.** All meals will be served on reusable dining ware.

- L. All social service facilities must show compliance with all building and fire safety regulations either by issuance of a Certificate of Occupancy or Certificate of Completion by the City. Any existing facility proposed to accommodate dining, sleeping, or assembly services should first be assessed by a registered architect to determine compliance with requirements for building construction and safety.

**Response: Complies.** The proposed Social Service Facility will comply with all applicable building and fire safety regulations either by issuance of a Certificate of Occupancy or Certificate of Completion by the City. A registered architect or other licensed professional will determine compliance with requirements for building construction and safety, as necessary.

- M. All facilities providing meals must provide at least one seat for each two guests served during the meal period.

**Response: Complies.** The proposed Social Service Facility will provide at least one seat for each two guests served during the meal dining period.

- N. Homeless shelters must have on-site security personnel during the hours of operation. Operation must also ensure that neither guests nor others are sleeping in areas not within the designated and approved locations.

**Response: Not applicable.**

- O. Shelters must have at least one (1) telephone available for guest use during the normal hours of operation. Food services facilities should have at least one (1) telephone available.

**Response: Complies.** The proposed Social Service Facility will have at least one telephone available for guest use during the normal hours of operation.