

**LUTHERAN SENIOR SERVICES AFFORDABLE HOUSING
TENANT SELECTION PLAN
ELIGIBILITY FOR ADMISSION
FOR 202/8 COMMUNITIES**

(Updated March 1, 2018; Effective April 1, 2018)

Purpose of the Tenant Selection Plan

Lutheran Senior Services Affordable Housing, as described herein after as owner/agent, Tenant Selection Plan describes program eligibility, application procedures, screening of applicants, equal opportunity requirements and nondiscrimination requirements, when the applicant can be rejected, and selecting between current tenants and applicants on the waiting list who need housing assistance.

The Tenant Selection Plan is designed to protect the owner/agent, the tenants and the applicant. The owner/agent is protected against charges of illegal discrimination, arbitrariness and partiality. The tenants are protected against the admission of someone who will not respect their rights. The applicant is protected against illegal discrimination and favoritism. The policies of tenant selection are consistently and fairly applied and all applicants are accepted or rejected by the same selection criteria.

The Tenant Selection Plan is established at the project level, not by law or regulations, but is subject to applicable laws and regulations, and is not so restrictive that it places undue hardship on individual applicants or frustrate the purpose of federal assistance or violates equal opportunity law.

Project and Program Eligibility Requirements

To be eligible for admission in these communities, an applicant must qualify as an elderly or disabled family.

Elderly families are: (1) Families of two or more persons, the head of which (or his or her spouse) is 62 years of age or older; (2) The surviving member or members of an elderly family; (3) A single person who is 62 years of age or older; or (4) Two or more elderly persons living together or one or more such persons living with another person who is determined by HUD, based upon a licensed physician's certificate provided by the family, to be essential to their care or well-being.

Some of the units are under the provision of federal legislation which authorizes the owner/agent to accept applications from younger individuals who meet HUD's definition of a person with a disability and require the special features of an accessible unit.

A person with disabilities means: (1) Any adult having a physical, mental, or emotional impairment that is expected to be of long continued and indefinite duration, substantially impedes his or her ability to live independently, and is of a nature that such ability could be improved by more suitable housing conditions; (2) A person with a developmental disability, as defined in Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C.



6001(8)), (3) A person with a chronic mental illness, i.e., a person who has a severe and persistent mental or emotional impairment that seriously limits his or her ability to live independently, and whose impairment could be improved by more suitable housing conditions; (4) Persons infected with the human acquired immunodeficiency virus (HIV) who are disabled as a result of infection with the HIV are eligible for occupancy in the Section 202 projects designed for the physically disabled, developmentally disabled, or chronically mentally ill depending upon the nature of the person's disability. (24 CFR 891.505)

Positive identification with a picture will be required (photocopy may be kept on file). All family members who are the head-of household, co-head, spouse, or other member 18 years of age and older, are required to sign HUD 9887/9887A consent and verification forms. Family members consist of head-of-household, co-head, spouse, other adult member, foster members, and children. All information reported by the family is subject to verification.

Applicants who are full-time students or a household where all members are full-time students are not considered qualified tenants for a 202/8 property, unless one of the following apply: the applicant is married and filing a joint tax return; a title IV recipient enrolled in a job training program under the Job Training Partnership Act; or a single parent living with his/her minor child who is not a dependent on another's tax return. All family members must complete the Student Certification Form prior to admission, and annually for a 202/8 property.

Assistance in subsidized housing is restricted to U.S. citizens or national and non-citizens who have eligible immigration status as determined by HUD. All family members in the Section 202/8 communities, regardless of age, must declare their citizenship or immigration status. Applicants who hold a non-citizen student visa are ineligible for assistance, as are any non-citizen family members living with a student. For non-citizens age 62 and older, a signed declaration of eligible noncitizen status and proof of age will be required.

Non-citizen applicants will be required to submit evidence of eligible immigration status at the time of application and will be verified through the U.S. Immigration & Customs Enforcement, Systematic Alien Verification for Entitlements (SAVE) Program. All family members age 18 older are required to complete a Citizenship Declaration Form. All information reported by all family members is subject to verification.

The apartment unit must be the family's sole residence. All Applicants **must** disclose if they are currently receiving HUD housing assistance. The owner/agent must not provide assistance to applicants who will maintain a residence in addition to the HUD-assisted unit. Applicants must agree to pay the rent required by the program under which they will receive assistance.

HUD provides the owner/agent with information about an applicant's current status as a HUD housing assistance recipient. When processing an application the owner/agent will conduct an Existing Tenant Search through the Enterprise Income Verification (EIV) System to verify if the applicant and/or other member of the applicant household is currently receiving HUD assistance.



Nothing prohibits a HUD housing assistance recipient from applying to this property. However, the applicant must move out of the current property and/or forfeit any voucher before HUD assistance on this property will begin. Special consideration applies to

- 1) Minor children where both parents share 50% custody
- 2) Recipients of HUD assistance in another unit who are moving to establish a new household when other family/household members will remain in the original unit

If the applicant or any member of the applicant household fails to fully and accurately disclose rental history, the application may be denied based on the applicant's "misrepresentation" of information.

This information will be reviewed by conducting a Multiple Subsidy Report through HUD's Enterprise Income Verification (EIV) System at each Annual Certification and/or an Interim Certification. If any household member receives or attempts to receive assistance in another HUD assisted unit while receiving assistance on this property, the household member will be required to reimburse HUD for assistance paid in error. This is considered a material noncompliance Lease violation and may result in penalties up to and including eviction and pursuit of fraud charges.

Social Security Number Requirements

Applicants and tenants must disclose Social Security Numbers (SSN) for all household members, except those who do not contend eligible immigration status, and tenants age 62 or older as of January 31, 2010, whose initial determination of eligibility was begun before January 31, 2010, and provide verification of the complete and accurate SSN assigned to them, before the household may be housed. A copy of the SSN will be maintained in the family's applicant/tenant file.

Applicants do not need to disclose their SSN in order to be placed on the waiting list, however the applicant has 90 days from when they are offered an apartment to disclose/verify the SSN to retain their place on the waiting list. The applicant may even be referred to the community's Service Coordinator for help in obtaining a copy of their SSN card from the Social Security Administration. Applications will be placed in pending status until proof of their SSN is obtained. After 90 days, if the applicant is unable to disclose/verify the SSN the applicant will be determined ineligible and removed from the waiting list.

All household members must disclose and document SSN for members, before assistance can begin. Live-in Aides and foster members are also subject to the SSN requirements. Under certain circumstances, the owner/agent may provide an additional 90 days to allow the resident to obtain SSN information in accordance with HUD requirements.

The owner/agent must deny and/or terminate HUD assistance, in accordance with the provisions governing the program, if the assistance applicant does not meet the applicable SSN disclosure, documentation, and verification requirements.

The SSN provided will be compared to the information recorded in the Social Security Administration database, through HUD's Enterprise Income Verification (EIV) System, to ensure



that all household members information, SSN, birth date and last name, match within 90 days of move-in. If EIV returns an error that cannot be explained or resolved, assistance and/or tenancy may be terminated and any assistance paid in error must be returned to HUD. If any family member deliberately provides an inaccurate SSN, the owner/agent and/or HUD may pursue additional penalties due to attempted fraud.

Income Eligibility Requirements

The applicant family’s annual income must not exceed program income limits established annually by HUD. Income eligible families must also need the assistance; the amount the family would be required to pay using the applicable HUD rent formula must be less than the Gross Rent for the unit. Income limits for this property are listed below:

Very Low-Income Limit (VLI)	50% of median income
Extremely Low-Income Limit (ELI)	30% of median income

Owner/agent must rent at least 40 percent of the units that become available each fiscal year to families whose income does not exceed 30 percent of the area median income (Extremely Low Income (ELI) Limit) at the time of admission. If the applicant family’s income exceeds 30 percent of the area median income (AMI), but is below the federal poverty level, the family will not be skipped over on the waiting list as a result of the ELI admission targeting requirements in the housing program.

Occupancy Standards

Unit Size	Minimum Occupants	Maximum Occupants
Efficiency Unit	1	1
One (1) Bedroom Unit	1	2

Fair Housing and Equal Opportunity Requirements

Lutheran Senior Services Affordable Housing is committed to equal opportunity and complies with Section 504 of the Rehabilitation Act of 1973, the Fair Housing Act and Title IV of the Civil Right Act of 1967. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in any program or activity receiving federal assistance from HUD. An owner cannot determine if a handicapped person is eligible for the project program based on his/her ability to “take care of himself/herself or the unit”; the handicapped person makes that determination. The Fair Housing Act prohibits discrimination based on race, color, religion, sex, nation origin, disability and familial status. It applies to housing regardless of the presence of federal financial assistance from HUD. Title VI of the Civil Right Act of 1964 prohibits discrimination on the basis of race, color or nation origin in any program or activity receiving federal financial assistance from HUD. Equal Access to Housing in HUD Programs regardless of sexual orientation or gender identity is intended to ensure that housing across HUD programs is open to all eligible individuals and family regardless of actual or perceived sexual orientation, gender identity or marital status.



Section 504 of the Rehabilitation Act of 1973

The owner/agent will inform the family that a final decision on eligibility cannot be rendered until all information is verified. The owner/agent will advise the family that HUD might compare the information a family has supplied with federal, state, or local information about that family's income and household composition. The owner/agent will also inform the family that federal laws prohibit discrimination against individuals with disabilities and provide an overview of its obligation toward such individuals. Obligations include:

1. Adopting and implementing nondiscrimination procedures.
2. Implementing procedures and using auxiliary aids to ensure effective communication with the handicapped.
3. Permitting the use of assistive devices.
4. Accommodating requests to make units and facilities handicapped accessible and usable.
5. Permitting handicapped tenants to modify individual units or common areas at their expense where the modification would pose an undue financial burden to the project.
6. Accommodating requests for reasonable modifications in rules, policies, practices and services where necessary to afford a handicapped person equal opportunity to use and enjoy the premises.
7. Keeping records regarding Section 504 compliance and making such records available to HUD.
8. Performing a self-evaluation (to determine compliance with 24 CFR Part 8 and Chapter 2 of the HUD handbook 4350.3) and making necessary modifications after consultation with interested persons.
9. Designating at least one person to coordinate efforts to comply with Section 504 and notifying all applicants and tenants in writing that the project does not discriminate on the basis of handicap, for projects employing more than 14 people.
10. The owner/agent will inform the elderly and/or persons with disabilities who are eligible applicants that they may not be prohibited from keeping household pets in their units nor be discriminated against because of pet ownership, provided that they uphold owner/agent's reasonable pet rules on keeping common household pets.

Violence Against Women Act & Justice Department Reauthorization Act of 2013 (VAWA)

The Violence Against Women Act and Justice Department Reauthorization Act of 2013 (VAWA) applies to all multifamily assisted housing properties, including those with project-based Section 8, Section 202 and 811 supportive housing for the elderly and people with disabilities; Section 236



and 221(d)(3) below market and reduced interest rate programs; and the Section 811 Project Rental Assistance grant program. VAWA provides legal protections to victims of domestic violence, dating violence, sexual assault, and stalking. The owner/agent must provide applicants/tenants the option to complete the Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation, form HUD-5382. The form may be made available to all eligible residents at the time of admission, or in the event of a termination or start of an eviction for cause proceeding, the certification may be enclosed with the appropriate notice, directing the family to complete, sign and return the form within fourteen (14) business days. Owner/agent may extend this time period at their discretion.

In addition to the certification form we request that an individual produce:

1. A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or, a police report; or
2. A document signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional or a mental health professional from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of the abuse in which the professional attests, under penalty of perjury under 28 U.S.C. 1746, to the professional's belief that the incidents are bona fide incidents of abuse, and the victim of domestic violence, dating or stalking as signed or attested to the documentation.

Owner/agent is not required to demand that an individual produce official documentation or physical proof of an individual's status as a victim of domestic violence, dating violence, sexual assault, or stalking in order to receive the protections of the VAWA. Owner/agent may, at their discretion, provide assistance to an individual based solely upon the individual's statement or other corroborating evidence. Careful evaluation of abuse claims is used as to avoid an eviction based on false or unsubstantiated accusations.

All correspondence with the individual will be discussed via telephone. In the event that the abuser is watching the victim's mail, owner/agent will ask if the individual can come to the office to sign the appropriate paperwork and bring any appropriate documentation to the office. All information is confidential and kept in a separate secure file located from other tenant files.

Nondiscrimination Standards

Lutheran Senior Services Affordable Housing does not discriminate.

1. There is no assigning of minorities to designated units or sections of this project, or limits set on the number of one minority or another to be selected for tenancy.
2. There will be no renting units to one sex and not the other.
3. There are no priorities based on sponsoring organization.



4. There is no discrimination solely because of a disability within the guidelines of the housing program. The owner/agent does not deny qualified individuals housing or any other benefits on the basis of their disability. However, only a set number of units in the project are designed for mobility impaired individuals.
5. No inquiries will be made to determine whether an applicant is disabled or the nature or severity of such disability. The owner/agent does need to verify the applicant's need for the architectural features of a mobility impaired unit if one is requested. No prospective tenants can be required to undergo physical examinations.
6. There is a minimum age necessary for eligibility requirements, but no maximum age in this program.
7. There is no discrimination based on race, color, religion, sex, nation origin, disability and familial status.
8. No priorities or application criteria (i.e. variations in charges or deposits) are based on race, color, religion, sex, nation origin, disability and familial status.
9. There is no segregation on the basis of disability.
10. The owner/agent does not require donations, contributions, or membership fees as a condition of admission.
11. There is no segregation on the basis of income.

Applicant Screening Criteria

The applicant household must meet the Tenant Selection Criteria established by the owner/agent to protect the rights and needs of the community for a decent, safe and livable environment. It is sometimes necessary to deny admission to applicants whose habits and practices may reasonably be expected to have detrimental effect on other tenants, the immediate environment or financial stability of the property.

The owner/agent uses specific criteria to determine an applicant's final eligibility for admission according to HUD's guidelines regarding drug-related and/or criminal activity (including registration as a sex offender); as well as the owner/agent's screening of rental history; the applicant's ability to pay rent on time; and the ability to meet the requirements of the Lease. Please note that *screening* for suitability of tenancy is not a determination of *eligibility* for the program. *Eligibility* is a determination that an applicant meets all of the requirements for the type of subsidy program.

Verification Procedures:

The owner/agent will reject an applicant if any of the following facts are verified:



1. The past performance of the applicant or other members of the applicant's household in meeting financial obligations has been poor as demonstrated by a credit report and/or landlord references. In determining an applicant's ineligibility based on a previous history of nonpayment of rent, the owner/agent will consider whether:
 - a. The record of nonpayment was due to the applicant being required to pay excessive rent (paying more than 50% of family income for rent) and the applicant demonstrated responsible efforts to resolve the nonpayment problem.
 - b. The applicant or members of the applicant's household have a history of disturbance of neighbors, damage to property, or living or housekeeping habits at prior residences, which would be likely to interfere with other tenants in such a way as to diminish their enjoyment of the premises as evidenced by landlord or other references.
2. The applicant or any member of the applicant's household, including live-in aide, has been convicted of a violent crime or has a felony within the past five (5) years of submitting the application, the applicant will be denied based on the conviction. If an applicant, or household member, including live-in aide, has been convicted of, or is subject to a lifetime registration requirement under a state sex offender registration program, the applicant is ineligible for occupancy in a HUD, or federally funded community. The applicant and all members of the household are subjected to a sex offender check for all states they have previously resided.
3. The applicant or member of the applicant's household, including live-in aide, has been convicted of prior drug-related activity, has a record of drug-related criminal activity, or has been evicted for drug-related activity. Drug-related criminal activity is the illegal manufacture, sale, distribution, use or possession with intent to manufacture, sell, distribute or use of controlled substance. Pursuant to federal law, persons evicted from public housing of Indian housing or any Section 23, or any Section 8 program because of drug related criminal activity are ineligible for admission to HUD subsidized housing at Lutheran Senior Services for a five (5) year period beginning on the date of such eviction.
4. The applicant or a member of the applicant's household, including live-in aide, has a record of criminal activity or of physical violence to persons or property which would adversely affect the health, safety or welfare of other tenants or employees of the community or the right of tenants to the peaceful enjoyment of the premises. In determining an applicant's ineligibility on these criteria, the owner/agent will review police records and will consider the time, nature and extent of the applicant's conduct and factors which might indicate a reasonable probability of favorable future conduct as outlined in Applicant Screening Criteria contained above. The owner/agent may conduct fingerprint checks on applicant's and tenant's when information is received indicating a criminal history.
5. The applicant or a member of the applicant's household has been evicted within the past five (5) years of submitting the application, the applicant will be denied based on the eviction. If the applicant or a member of the applicant's household is a former tenant of a HUD subsidized property who had a record of lease violations or whose residency was terminated by the management, the applicant will be denied. No previous tenant may be readmitted unless all



previous amounts owed have been paid; but, payment of such debt does not necessarily entitle an applicant to eligibility under this section unless the Authority has agreed in writing to grant eligibility upon the payment of the amount owed.

6. There is reasonable cause to believe that any member of the applicant household, including live-in aide, has exhibited a pattern of illegal use of a controlled substance or a pattern of abuse of alcohol which interfered with the health, safety, or right to peaceful enjoyment of the premises by other tenants. Acceptable landlord references and court and police record reports showing that no household member has exhibited these patterns constitute adequate evidence that the household meets this criteria.
7. The applicant has falsified information requested on the application for, or has failed to provide information requested.
8. There is other evidence relating to previous habits and practices which indicates that the applicant or a member of the applicant's household would be likely to have a detrimental effect on the community if admitted.

The owner/agent will consider the nature of the crime, as well as the time since the offense/conviction occurred when making their eligibility determination. In the event that the applicant has served time in a correctional institution, the applicant must be able to establish that he/she has been able to live with minimum supervision for at least the prior 12 months. Residency in a "half-way house" does not meet this standard. However, minimum supervision under the probation/parole program may be considered as satisfying this requirement.

The burden of proof is on the applicant to demonstrate, to the satisfaction of the owner/agent that the applicant is:

1. Willing to reliably discharge the financial obligations or renting an apartment.
2. Willing to maintain the apartment in a clean, safe, decent and sanitary condition, the owner/agent will conduct a home visit prior to approval for occupancy. Home visits are to show that the applicant will maintain their unit in a clean, safe, decent and sanitary condition. Home visits will be conducted within a 75 mile radius from the community applied to.
3. Willing to live peaceably with neighbors in a tenant community.
4. Willing to provide the owner/agent with accurate and complete information on the application form or any form required to determine initial eligibility. Failure or refusal to comply with the above or provision of falsified information is grounds for a determination of ineligibility.
5. Willing to obtain and maintain the necessary utility services in housing unit, if applicable. The applicant must be eligible for the necessary utility services to be billed in his/her name, if applicable.



6. Willing to accept and abide by the terms of the lease agreement, all attachments, addenda and all rules and regulations.

Sources of Information

Sources of information that the owner/agent will include but are not limited to:

1. Members of the applicant household.
2. Present and prior landlords or housing providers.
3. Present and former employers.
4. Credit bureaus.
5. Landlord Record services, where applicable.
6. Social workers, drug and alcohol treatment centers, clinics, health care providers and clergy.
7. Police Departments, parole officers and court records.
8. Internal Revenue Services and other federal, state and local government agencies.
9. Neighbors, community leaders and neighborhood watch groups.
10. The U.S. Department of Justice National Sex Offender Public Website (NSOPW).

The owner/agent will notify any applicant found ineligible as the result of failure to meet the Applicant Screening Criteria of the specific reason(s) for the determination and shall maintain a record of all applicants determined ineligible for the HUD required time period.

The owner/agent will be the final judge of what constitutes adequate and credible information. If there are sufficient doubts with respect to the veracity, credibility, or reliability of any information received. Lutheran Senior Services Affordable Housing retains the right to pursue alternative sources of information until satisfied that the information received is the best available.

Special Eligibility Provisions Relating to Applicants Requiring a Live-in Aide:

Some applicants and tenants who would not otherwise be able to fully discharge the responsibilities of residency may be able to do so with the assistance of a live-in aide residing in the unit. When an applicant or tenant can provide documentation to the satisfaction of the owner/agent that a live-in aide is required and available, the following provisions shall apply:

1. The live-in aide must submit information as requested and be reviewed by the owner/agent for eligibility under the Tenant Selection Criteria of this policy. If the owner/agent determines an individual proposed as a live-in aide to be ineligible, the tenant or applicant may propose an



alternative live-in aide for screening or may appeal the owner/agent's determination following the rejection procedures at the end of this Tenant Selection Plan.

2. **Unit Size Consideration**—owner/agent occupancy standards are: two persons per one bedroom. Lutheran Senior Services 202/8 communities have efficiency (0 bedroom) and one (1)-bedroom units. As a result, no more than one (1) person can reside in an efficiency unit and no more than two (2) people may reside in a one-bedroom unit.
3. A live-in aide who has been approved for occupancy by the owner/agent is added to the lease by means of a live-in aide addendum and does not have rights to occupy the unit as the Remaining Member of a Tenant Family if the tenant needing the services vacates the unit or dies.
4. The head-of-household is responsible for all acts of all household members, including the live-in aide, with respect to the requirements of the dwelling lease. Any violation of Lease provisions by the live-in aide may be cause for eviction of the household. If the live-in aide, has been convicted of, or is subject to a lifetime registration requirement under a state sex offender registration program, the applicant is ineligible for occupancy in a HUD, or federally funded community. The applicant and all members of the household, including live-in aide, are subjected to a sex offender check for all states they have previously resided.

Application

The tenant selection process begins with the application. The application contains information sufficient to tentatively determine the family's eligibility, size of unit needed, the head-of-household and other family members. The application also informs the applicant and family members that they must meet the Tenant Selection Plan Criteria and will be subjected to a background check, credit screening and tenant rental history check.

Applying for Housing

All persons/families interested in applying for housing at Lutheran Senior Services Affordable Housing communities must:

1. Pick up an application or request one be mailed. The form solicits sufficient information to assess eligibility.
2. Complete the entire application and all required documents, date and sign it, return it to the owner/agent in person or by mail. The applicant must:
 - a. List all persons who will reside in the unit.
 - b. Show ability to meet financial obligations in a satisfactory manner and on time.
 - c. Have good and acceptable reference(s) from landlord(s), both current and previous, listed on the application for a time period of two years.



- d. Show that the applicant has the ability to fulfill all Lease requirements with or without supportive care assistance where applicable.

All applications are logged at the community by documenting the name of the applicant and the date and time the application was received at the community.

Processing Applications

For each application received, the owner/agent will:

1. Admit the applicant
2. Reject the applicant (see rejection section)
3. Place the applicant on the waiting list (see waiting list)

The owner/agent will place all eligible applicants for the community chronologically on the waiting list and notify the applicant head-of-household when a suitable unit is expected to become available.

Waiting List

All persons who meet eligibility requirements will be placed on the waiting list regardless of race, color, religion, sex, national origin, disability, and familial status. The waiting list is arranged in chronological order and the records indicate the date and time the application was placed on the waiting list.

The owner/agent gives preference to units designed specifically for the elderly, handicapped/disabled to households whose head-of-household, or co-head is a member of the group for which the units were designed.

Applicants will be removed from the waiting list under the following conditions:

1. The applicant requests to be removed by phone or in writing. Verbal request will be confirmed in writing by the owner/agent prior to removal.
2. Reasonable efforts to contact the applicant have been unsuccessful (i.e. mail returned, mail could not be forwarded, telephone number disconnected or not the correct number).
3. Applicant has been told in writing they no longer qualify for housing.
4. The applicant has rejected two different offers of apartment units at the community.

Applicants who have been offered a unit and reject the first unit offered, will go to the bottom of the waiting list. After two rejections of units by an applicant, the applicant's name is removed from the waiting list. A response of "not interested at this time" will be interpreted as a rejection.



A written notice will be sent to the applicant confirming that their name has been removed from the waiting list and they are allowed to reapply at a future date. This procedure is uniformly applied to all persons.

The owner/agent's system of removing applicant names from the waiting list will not violate the rights of persons with disabilities. If an applicant claims that the failure to respond to a request for information or updates was caused by a disability, the owner/agent will verify that there is in fact, a disability and the disability caused the failure to respond, and provide a reasonable accommodation.

It is not the policy of Lutheran Senior Services Affordable Housing to close waiting lists. An annual purge enables the project to maintain a waiting list which can be handled efficiently and in accordance with the policies and regulations.

Unit Transfer Policies

Unit Transfers are possible for individuals requesting the transfer due to a medical reason certified by a local medical professional, or a need for an accessible unit. Residents already in-place at the community will be given preference for a vacant unit in the community, over an applicant on the waiting list.

Applicants who are offered and accept accessible units who do not need the special design features of the unit, will be required to sign an addendum to the Lease stating they understand that they will have to move into a non-accessible unit in the event the accessible unit has been requested, and a non-accessible unit is available.

Formal Interview

As a vacancy becomes available a formal interview is scheduled to determine HUD eligibility requirements. Topics covered during the formal interview are as follows:

1. **Follow up on application.** The owner/agent will update and confirm all information on the application.
2. **Program requirements.** Owner/agent will explain program requirements, verification procedures and penalties for false or incomplete information.
3. **Release Forms.** All members of an applicant family who are at least 18 years of age, and each family head-of-household, spouse, or co-head, regardless of age, must sign and date the HUD required consent forms and verification forms authorizing the owner/agent to verify family income and other applicable eligibility factors.
4. **Eligibility certification.** Owner/agent will obtain family income and composition information and other data needed to certify eligibility and compute the tenant's share of the rent.



5. **Finances.** Owner/agent will review the financial information on the application and specifically ask the applicant for all the income received, and assets held by all family members of the household. Owner/agent will ask the head-of-household and all other household members to certify in writing whether any family member has disposed of assets for less than the fair market value during the past two years.
6. **Social Security.** Owner/agent will require the head-of-household, and all household members to disclose and document all Social Security Numbers (SSN) or present an identification number if a SSN has not been assigned.

Health Information Requests

The owner/agent will request health information only when the applicant requests a unit designated for persons with disabilities or claims a preference for persons with disabilities. In such cases, inquiries may be made to determine whether an applicant is qualified for a unit or preference available to persons with disabilities or to persons with a particular type of disability.

Otherwise, the owner/agent may not make inquiries to determine whether a person is disabled or to determine the nature or severity of a disability. The applicant has to have the ability to fulfill all of the lease requirements with or without assistance. In addition, the owner/agent cannot require prospective tenants to undergo physical examinations.

Rejections

Applicants may be rejected if they:

1. Fail to meet the Tenant Selection Plan criteria.
2. Are unable to disclose and document Social Security Numbers or provide an identification number.
3. Fail to meet HUD's criteria.

Some examples of the rejections listed above are as follows:

1. The family income (using the HUD definition of income) is over the applicable income limits published by HUD
2. Negative reference from current and/or previous landlords.
3. Submission of false or untrue information on the application or failure to cooperate in the verification process.
4. The household size, including a live-in aide is not appropriate for the unit.
5. Failure to sign designated forms and/or documents upon request.



6. The applicant has a pet that does not conform to management or HUD rules and regulations. Assistance animals are not considered pets.
7. This is not the applicant's only residence.
8. The applicant is not capable of fulfilling the Lease agreement, with or without assistance.
9. The applicant has a history of non-payment of rent or of being evicted for non-payment.
10. Any conviction for the use, distribution, or manufacturing of any controlled substance. Anyone who is a current illegal user or an addict of a controlled substance.
11. Anyone whose tenancy would constitute a threat to the health and safety of other individuals or whose tenancy would result in substantial physical damage to the property of others, or whose tenancy would interfere with their peaceful enjoyment of the premises.

Rejection Procedures

When an application is rejected by the Community Manager, the applicant will be notified of this decision in writing. This written statement, sent in a timely fashion, will include the reason(s) for the rejection, and state that the applicant has the right to request a meeting with someone other than Community Manager to discuss the rejection. The applicant will be further instructed to request the meeting in writing within 14 days of the applicant's receipt of the rejection letter.

If the applicant wants to request a meeting, the applicant's written request must be sent to the owner/agent within 14 days of the applicant's receipt of the rejection notice. The requested meeting will be held by someone other than the Community Manager within a reasonable period of time.

After the meeting the applicant is notified in writing within five (5) calendar days, whether or not the original decision has been changed. All of this material (original application, rejection letter, applicant's request for a meeting, and final determination) must be kept for three years confidentially in the files.

