

TENANT SELECTION CRITERIA - ADMISSIONS

Keystone/Stonehaven Apartments, Ames, Iowa

(515) 232-2865 and 232-2021

INTRODUCTION:

Ames Ecumenical Housing, Inc./Stonehaven of Ames, Inc. are non-profit Iowa corporations. It owns and operates Keystone/Stonehaven Apartments, government financed and subsidized housing projects which provides decent, safe, sanitary, and affordable housing. Keystone/Stonehaven Apartments is subject to Title VIII of the Civil Rights Act of 1968, Section 504 of the Rehabilitation Act of 1973 as amended, and the amendments of the Fair Housing Amendment Act of 1988. The purpose of these projects is to provide housing for *very low and extremely low* income eligible elderly individuals and families through the Department of Housing and Urban Development's Section 8, 202 Program covering 56 units at Keystone and 54 units at Stonehaven. Individuals and families will qualify providing their income does not exceed the limits as governed by HUD and they meet all other applicable standards. Residency is open to *all* qualified eligible persons who will be admitted in accordance with the HUD-approved Affirmative Fair Housing & Marketing Plan (HUD Form 935.2). Keystone/Stonehaven Apartments accepts applicants, admits residents, and employs staff without regard to race, color, creed, national origin, age, handicap status, familial status, religion, sex or sexual orientation or gender identity. Keystone/Stonehaven Apartments does not directly provide health related services by medical professionals, non-professional health or assistance care, or personal service aides. However an individual can make arrangements for outside services in order to meet the requirements of the lease.

PURPOSE OF THE TENANT SELECTION CRITERIA:

Keystone/Stonehaven's Tenant Selection Criteria - Admissions and Occupancy Procedures describe application procedures, screening of tenants, equal opportunity requirements and nondiscrimination requirements, occupancy standards, when the applicant can be rejected, and selecting between current tenants and applicants on the waiting list who need Section 8 housing assistance.

The Tenant Selection Criteria – Admissions and Occupancy Procedures, are designed to protect the owner, the tenants, and the applicant. The owner 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 – admissions and occupancy are consistently and fairly applied, and all applicants are accepted or rejected by the same selection criteria.

Tenant selection criteria, Admissions and Occupancy Procedures are established at the project level, not by law or regulations, but are subject to applicable laws and regulations. The Tenant Selection Criteria, Admissions and Occupancy Procedures are not so restrictive that they place

undue hardship on individual applicants or frustrate the purpose of federal assistance, or violate equal opportunity law.

PROJECT ELIGIBILITY REQUIREMENTS

Keystone/Stonehaven Apartments is a Section 202/8 project for elderly and persons with a mobility impairment. It began and has historically operated as a project for elderly persons over 62 years of age and persons who are mobility impaired. Preference is given to elderly persons or elderly families as follows: (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 a family described in paragraph (1) living in a unit with the now deceased member of the family at the time of his or her death; (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. Revised 12-30-03 per HB 4350.3, chapter 2, esp. 2-21, and 2-31.E.5, and chapter 3-27B.

NON-CITIZEN RULE

Applicability

The restrictions on assistance applies to all properties covered by the handbook **except** the following;

1. Section 221 (d) (3) BMIR properties
2. Section 202 PAC
3. Section 202 PRAC
4. Section 811 PRAC
5. Section 202 properties with units not receiving assistance under the Rent Supplement or Section 8 programs.

By law, only U.S. Citizens and eligible non-citizens may benefit from federal rental assistance. Compliance with these rules ensures that only eligible families receive subsidy. These requirements apply to families making application to the property, families on the waiting list, and tenants.

Requirements

1. Assistance in subsidized housing is restricted to the following:
 - a. U.S. Citizen
 - b. Non- citizens who have eligible immigration status as determined by HUD
2. All applicants for assistance will receive notice of the requirement to submit evidence of citizenship, eligible immigration status at time of application.
3. All family members, regardless of age, must declare their citizenship or immigration status.
4. Non-citizens (except those age 62 years of age and older) must sign a Verification Consent Form and submit documentation of their status or sign a declaration that

they do not claim to have eligible status. Non-citizens age 62 and older must sign a declaration of eligible immigration status and provide a proof of age document. U.S. citizens must sign a declaration of citizenship and provide proof of age document.

5. Applicant families that are mixed are eligible only for prorated assistance.
6. A mixed family- a family with one or more ineligible family members and one or more eligible family members – may receive either prorated assistance, continued assistance, or a temporary deferral of termination of assistance.
7. Non-citizen students with a citizen spouse or child is considered a mixed family.
8. Applicants who hold a non-citizen student visa are ineligible for assistance as are any non-citizen family members living with the student.

Required Documentation

The following documentation will be required for each family member regardless of age:

1. From U.S. Citizens, a signed declaration of citizenship, a U.S. birth certificate or passport.
2. From non-citizens 62 years of age and older, a signed declaration of eligible non-citizens status and proof of age:
3. From non-citizens under the age of 62 claiming eligible status:
 - a. A signed declaration of eligible immigration status;
 - b. A signed consent form; and
 - c. One of the DHS approved documents.
4. Non-citizens not claiming eligible immigration status may elect to sign a statement that they acknowledge their ineligibility for assistance.

Timeframes

Applicants must submit required documentation of citizenship/immigration status no later than the date the owner initiates verification of other eligibility factors. Owner will begin this verification process prior to any other verification efforts. If applicant is not able to supply owner with required information at time of request, owner may grant an extension of not more than 30 days if applicant certifies that the documentation is temporarily unavailable. Owner will notify applicant in writing if an extension request is approved or denied.

Prohibition Against Delay

Owner will not delay the family's assistance if the family submitted its immigration information in a timely manner, but the DHS verification or appeals process has not been completed.

Social Security Numbers

All applicants and residents (all household members) must disclose and provide verification of the complete and accurate Social Security Number (SSN) assigned to them unless an individual meets an exception.

Exceptions to disclose SSNs are:

- Individuals who do not contend eligible immigration status; Or
- Individuals, age 62 or older as of January 31, 2010 and whose initial determination of eligibility was begun before January 31, 2010.

Applicants have 60 days from the date they are offered an available unit to disclose their SSN.

You may not become a participant in the program unless you submit the required social security number documentation within 60 days from the date signed above. (If you are at least 62 years old and unable to submit the required documentation within the 60-day period, an extension may be given.) After 60 days, if you have not been able to submit the required documentation, you will be determined ineligible and you will be removed from the waiting list.

All information reported by the family is subject to verification.

All adults in the applicant's family must sign verification consent form for management to verify all information prior to receiving Section 8 housing assistance and annually thereafter.

An applicant may be receiving subsidy elsewhere at the time of the application process; however, once the applicant is accepted as a resident of *Keystone/Stonehaven* he/she may not receive subsidy anywhere else.

Individuals who have already disclosed a valid SSN do not have to re-disclose their SSN. However, any affected tenants must provide verification of SSNs at the time of their next interim or annual Recertification.

A child under the age of 6 years added to the applicant household within the 6-month period prior to the household's date of admission. The household will have a maximum of 90 days after the date of admission to provide the Social Security number and adequate documentation that the Social Security number is valid. An additional 90 days may be granted under certain circumstances. If the household does not provide the Social Security number and adequate documentation to verify the Social Security number within the prescribed timeframe, HUD requires that the household's tenancy be terminated.

STUDENT ELIGIBILITY RULE

Eligibility of Students for Housing under Section 8 of the U.S. Housing Act of 1937. This Student Rule was effective January 30, 2006 which amended 24 CFR part 5, subpart F.

This Student Rule provides as follows and applies to both full time and part time students and applies to all project based Section 8 sites:

No assistance shall be provided under the Section 8 of the United States Housing Act of 1937 [42 U.S.C. 1437f] to any individual who:

- (1) Is enrolled as a student at an institution of higher education (as defined under section 102 of the Higher Education Act of 1965 [20 U.S.C. 1002]
- (2) Is under 24 years of age
- (3) Is not a veteran of the United States Military
- (4) Is unmarried
- (5) Does not have a dependent child
- (6) Is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible to receive assistance under Section 8 of the United States Housing Act of 1937 [42 U.S.C. 1437f]

For a student under 24 years of age to be eligible to receive Section 8 Assistance and live separate from parents under the above criteria:

Both the student and the parent's income must meet the HUD income requirements for Section 8 Housing or;

Be independent from his or her parents and meet HUD income requirements for Section 8 Housing.

Requirements for determining a student's eligibility for Section 8 assistance is to be ascertained at move-in, annual recertification or initial certification (when an in-place tenant begins receiving Section 8), and at the time of an interim recertification if one of the family composition changes as reported that a household member is enrolled as a student. Assistance must not be provided to an individual who is: Not living with his/her parents who are receiving Section 8 assistance.

(Keystone and Stonehaven Apartments are HUD 202/8 programs which has additional requirements: individuals under 62 must also have a mobility impairment as defined by the HUD 4350.3 and other applicable Federal, State and Local Laws.

To be classified as an independent student the student must meet the following requirements:

- Be of legal contract age under state law
- Has established a household separate from his/her parents or legal guardian for at least one year before applying to Keystone/Stonehaven Apartments or
- Be an independent student (an independent student is defined as one of the following:

1. Is at least 24 years old by December 31 of the year in which the student applies to get or keep Section Assistance
2. Is 18 years old or younger and a orphan or ward of the court
3. Is a veteran of the U.S. Armed Forces
4. Has legal dependents other than a spouse (for example, children or an elderly parent)
5. Is a graduate or a professional student
6. Is married

On July 27, 2006 President Bush signed into law an amendment to Public Law 100-249 which is summarized below:

Students with disabilities who were receiving Section 8 assistance as of November 30, 2005, are exempt from restrictions for providing Section 8 assistance to college students as provided by Public Law 109-249.

Students with disabilities who are applying for, or who started receiving Section 8 assistance after November 30, 2005, are not exempt from the restrictions of the new law.

-- OR --

Student eligibility requirements apply to applicants enrolled at an institution of higher education who are under 24 years of age, unless the applicant is a student who is living with his/her parents who are applying for Section 8 assistance.

Students who are 24 years of age or over, married, a veteran of the US Military, have a dependent child *or* is a person with disabilities, as defined in section 3(b)(3)(F) of the United States Housing Act of 1937 (42 USC 1437a (b3E)) that was receiving Section 8 assistance as of November 30, 2005 qualify.

If the applicant is legal contract age, is not claimed as a dependant on their parent(s) or guardian(s) latest tax return and meets the criteria from at least one of following questions, they qualify:

- Will you be at least 24 years old by December 31 of the current year?
- Have you established a household separate from parents or legal guardians for at least one year
- prior to application for occupancy?
- Were you an orphan or a ward of the court through the age of 18?
- Are you a veteran of the U.S. Armed Forces?
- Do you have legal dependents other than a spouse?
- Are you a graduate or professional student?
- Are you married?

If the applicant is claimed on their parent(s) or guardian(s) latest tax return or does not meet the criteria from at least one of above questions; they must meet eligibility requirements for Section

8 assistance and their parents, individually or jointly, must be income eligible for section 8 assistance.

The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth (as such terms are defined in section 725 of the McKinney-Vento Homeless Assistance Act) (42 U.S.C. 11431 et seq.), or as unaccompanied, at risk of homelessness, and self-supporting, by—

- a) a local educational agency homeless liaison, designated pursuant to section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act;
- b) the director of a program funded under the Runaway and Homeless Youth Act or a designee of the director;
- c) the director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (relating to emergency shelter grants) or a designee of the director; or a financial aid administrator; or

The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances.

Any financial assistance a student receives:

- (1) under the Higher Education Act of 1965,
- (2) from private sources, or
- (3) from an institution of higher education that is in excess of amounts received for tuition and any other required fees and charges is included in annual income, except if the student is over the age of 23 with dependent children or if the student is living with his or her parents who are receiving Section 8 assistance.

In addition, financial aid received from people living outside the unit is not counted if the student meets the definition of “vulnerable youth”. A vulnerable youth is defined as an individual who has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting. Furthermore, when it is determined that an individual is a “vulnerable youth”, such determination is all that is necessary to determine that the individual is an independent student.

INCOME LIMITS

The purpose of these projects is to provide housing for very low and extremely low income eligible elderly and/or mobility impaired individuals and families through the Department of Housing and Urban Development's Section 202/8 Program covering 56 units at Keystone and 54 units at Stonehaven. Individuals and families will qualify, providing their income does not exceed the limits as governed by HUD and they meet all other applicable standards. The actual income limits change annually and will be available with the application and brochure information.

APPLICATION

The tenant selection process begins with the application. The application contains information sufficient to tentatively determine the family eligibility, size of unit needed, household head, and if the applicant meets the tenant selection criteria, and the background and resident history.

APPLYING FOR HOUSING:

All persons/families interested in applying for housing at *Keystone/Stonehaven Apartments* must:

1. Pick up an application or request one be mailed. The form solicits sufficient information to assess eligibility.
2. Complete the entire application, date and sign it and return it to the project in person or by mail. The applicant must:
 - a. List all persons who will reside in the unit.
 - b. For those program facilities required to verify citizenship/immigration status: applicant and family member will be required to meet the requirements outlined in the non-citizen section of this policy.
 - c. Show ability to meet financial obligations in a satisfactory manner and on time.
 - d. Have a good and acceptable reference(s) from landlord(s), both current and previous, listed on the application for a time period of two years.
 - e. Show that the applicant has the ability to fulfill all the lease requirements with or without care assistance where applicable. Live-in Care Attendant is a person who resides with an elderly or handicapped person and who:
 - (1) Is determined essential to the care and well-being of the person.
 - (2) Is not obligated for the support of the person.

(3) Would not be living in the unit except to provide the necessary supportive services. This can be a family member with proper documentation/certification.

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

PROCESSING APPLICATIONS:

For each application received, *Keystone/Stonehaven Apartments* will:

1. Verify citizenship/immigration status if applicable (see non-citizen section)
2. Admit the applicant
3. Reject the applicant (see rejection section)
4. Place the applicant on the waiting list (see waiting list)
5. If an applicant is removed from the waiting list, and subsequently the owner determines that an error was made in removing the applicant, the applicant will be reinstated at the original place on the waiting list.

Keystone/Stonehaven Apartments will place all eligible families for the project chronologically on the waiting list and notify the 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, creed, sex, sexual orientation, gender identity, age, familial status, disability status or national origin. 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 waiting list will also include the income of the applicant to determine if the applicant meets HUD requirements as to very low or extremely low income.*

1. Effective June, 2000, a minimum of 40% of the Section 8 units that turn over in a year and are rented to applicants on the waiting list, must be rented to applicants who meet the “extremely low” income (30% or less of median income) limits.
2. In order to meet the “extremely low” income targeting standards applicable to Section 8 units, applicants who meet the “extremely low” income limits may from time to time “jump” ahead on the waiting list and be offered a unit even though one

or more “very low” income applicants were placed on the waiting list before the “extremely low” income applicant.

Income Targeting

Income targeting requirements apply to Keystone/Stonehaven Apartments fiscal year July 1 through June 30.

A. Implementation

1. “Extremely low income” (ELI) means families with incomes at 30% or below the median income.
2. Applicants from the project’s waiting list will be selected based on procedures below: (The policy used at this property is checked.)
 - a. Alternate move-ins, beginning the first of each year with an ELI family, or,
 - b. Project the number of turnovers for the year, and rent the first 40% of that number to ELI families.
3. If the waiting list does not include eligible applicants with annual incomes at or below 30% of the area median, management will market and outreach to achieve the desired mix. If after actively marketing for at least 30 days, management is unable to fill vacant units with ELI families, management may lease to other eligible families. Documentation of marketing efforts will be maintained on file by management.

Keystone/Stonehaven Apartments gives preference to units designed specifically for the elderly, handicapped/disabled, to households whose head or spouse is a member of the group for which the units were designed.

Applicants who have been offered a unit and rejected the unit go to the bottom of the waiting list and the application receives a new date and time the rejection of the unit was made by the applicant. After two rejections of units by an applicant, the applicant’s name is removed from the waiting list. A letter is sent to the applicant advising that their name has been removed from the waiting list and they are requested to reapply at a future date. This procedure is uniformly applied to all persons.

When an accessible unit becomes available, an in-place tenant who needs the features of the accessible unit is given preference for the unit over an applicant on the waiting list. The transfer of units is required and documented by an addendum to the lease.

**Violence Against Women and Justice Department Reauthorization Act of 2013
(VAWA / Protections for Victims of Domestic Violence, Dating Violence or Stalking)**

Keystone/Stonehaven supports victims of domestic violence, dating violence; victims of sexual assault or stalking and protects victims, as well as members of their family, from being denied housing or from losing their HUD assisted housing as a consequence of domestic violence, dating violence or stalking.

- Keystone/Stonehaven Provides all tenants notice of their rights and obligations under VAWA.
- Keystone/Stonehaven provides tenants the option to complete the Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking, form HUD-91 066. The certification form is available to all families upon their acceptance as a tenant. The HUD approved Certification form provides notice to the tenant of the confidentiality of the form and limits thereof.
- In the event of actual or threatened domestic violence, dating violence, sexual assault or stalking OR start of eviction the HUD-91 066 may be enclosed with an appropriate notice directing the family to complete, sign and return the form within fourteen (14) business days. The owner may extend this period at his/her discretion.

In lieu of or in addition to the certification form, the owner may accept the following:

- A federal, state, tribal, territorial, or local police record or court record, or,
- Documentation signed and attested to by a professional (employee, agent, or volunteer of a victim service provider, an attorney, medical personnel, etc.) from whom the victim has sought assistance in addressing domestic violence, dating violence or stalking or the effects of the abuse. The signatory attests under penalty of perjury (28 U.S.C. 1746) to his/her belief that the incident in question represents bona fide abuse, and the victim of domestic violence, dating violence or stalking has signed or attended to the documentation.

Keystone/Stonehaven is not required to demand 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. Keystone/Stonehaven, at their discretion, may provide assistance to an individual based solely upon the individual's statement or other corroborating evidence.

Keystone/Stonehaven will be mindful that the delivery of the certification form to the tenant via mail may place the resident in jeopardy. Keystone/Stonehaven will work with the tenant in making acceptable delivery arrangement, such as inviting them into the office or pick up the certification form or making other discreet arrangements.

Keystone/Stonehaven will provide VAWA Notice and VAWA* Certification to Section 8 resident(s) and applicants explaining their rights and obligations under VAWA protections (RHIP Listserv Posting #373).

Implementation: Keystone/Stonehaven will provide Notice of Occupancy Rights under the Violence Against Women (form HUD-5380) and Certification as a Victim (form HUD-5382) will be provided to:

- All resident families at their next certification or lease renewal.
- All applicants when denied or admitted (at MI).
- With any notification of eviction.
- With any notification of termination.

INTERVIEWS

PRELIMINARY INTERVIEW:

Once the application is received, the applicant is requested to call the office for a preliminary interview appointment. This does not mean that the applicant qualifies or is eligible for the program. Eligibility is determined after all income, assets, family composition, age, preference status, *etc.*, are verified. The preliminary interview is requested to determine the accuracy and completeness of the following:

1. information on the application
2. family income and composition
3. financial information and assets
4. criminal background history

After the preliminary interview, the applicant is informed of the following:

1. eligibility for housing
2. if appropriate unit size is available
3. number placement on the waiting list
4. requirement of notifying the project every six months of interest to remain on the waiting list.

- a. Failure to do so will result in a “reminder” letter to notify the project of interest within 14 days.
- b. If letter is received within 14 days, the name remains on the list in the same chronological/time order; if not,
- c. The name is removed from the active waiting list, a notice sent to the applicant, and the application is filed in the inactive waiting list file and kept confidential for three years.

Note: If the applicant writes or calls several months after the fact, the name is again placed on the active waiting list, with the date and time now reflecting the date the applicant called to reactivate. Such date is documented on the application and chronological order on the computerized waiting list.

It is not the policy of *Keystone/Stonehaven Apartments* to close the waiting list. The six-month purge enables the project to maintain a waiting list, which can be handled efficiently and in accordance with the policies and regulations.

FORMAL INTERVIEW:

As the applicant’s name nears the top of the waiting list, a formal interview is scheduled. Topics covered during the formal interview are as follows:

1. *Follow up on application.* *Keystone/Stonehaven Apartments* will update and confirm all information on the application.
2. *Program requirements.* *Keystone/Stonehaven Apartments* will explain program requirements, verification procedures and penalties for false or incomplete information.
3. *Release forms.* Consent forms for verification process must be signed by all household members who are age 18 and older.
4. *Eligibility certification.* *Keystone/Stonehaven Apartments* 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.* *Keystone/Stonehaven Apartments* will review the financial information on the application and specifically ask the applicant for all the income and assets received by members of the household. *Keystone/Stonehaven Apartments* will ask the head or spouse 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.* *Keystone/Stonehaven Apartments* As of January 31, 2010, all household members must disclose and document Social Security numbers for all members including children age six (6) and older. Live-in Aides and foster children are also subject to the SSN requirements. Applicants may document their social security numbers by presenting their social security cards or other documentation displaying the social security number.
7. *Information verification.* *Keystone/Stonehaven Apartments* will inform the family that a final decision on eligibility cannot be rendered until all information is verified. *Keystone/Stonehaven Apartments* 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. *Keystone/Stonehaven Apartments* 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:
- a. Adopting and implementing nondiscrimination procedures.
 - b. Implementing procedures and using auxiliary aids to ensure effective communication with the handicapped.
 - c. Permitting the use of assistive devices.
 - d. Accommodating requests to make units and facilities handicapped accessible and usable.
 - e. Permitting handicapped tenants to modify individual units or common areas at their expense where the modification would pose an undue burden to the project.
 - f. 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.
 - g. Keeping records regarding Section 504 compliance and making such records available to HUD.
 - h. Performing a self-evaluation (to determine compliance with 24 CFR Part 8 and Section 7 of the HUD handbook 4350.3) and making necessary modifications after consultation with interested persons.
 - i. 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.

Note: Keystone/Stonehaven Apartments need not make physical alterations or programmatic adjustments that would result in undue administrative or financial burden or which would result in a fundamental alteration in the nature of the program. Where the burdens of physical alterations are prohibitive, the owner still must allow a resident to make the alteration at his/her own expense. See page 20 for Reasonable Accommodation Policy

8. *Information for Elderly or Handicapped.* *Keystone/Stonehaven Apartments* 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 our reasonable pet rules on keeping common household pets.

SCREENING

PURPOSE:

Keystone/Stonehaven Apartments realizes that there may be circumstances, when screening applicants that might affect the outcome of original decisions. *Keystone/Stonehaven Apartments* is prepared to change its mind on rejections when presented with evidence. Consistency is important, but inflexibility does not accomplish the program's purpose. *Keystone/Stonehaven Apartments* will verify the applicant's explanation of the facts surrounding the extenuating circumstances and refuse occupancy to applicants who are unable to establish a current ability to comply with a project's legitimate requirements of tenancy. All screening costs are charged to the project.

It is important that all applicants be screened in accordance with HUD's regulations and sound management practices.

1. The screening and verification procedures of *Keystone/Stonehaven Apartments* attempt to ensure that the limited, federally assisted housing stock is available to those households, which meet the eligibility criteria established by HUD.
2. The objective of screening is to ascertain in a thorough and effective manner, that the applicant meets the fundamental requirements of occupancy. *Keystone/Stonehaven Apartments* applies adopted criteria uniformly to all applicants.

POLICY:

1. The personnel of *Keystone/Stonehaven Apartments* know and understand that the screening process is to be implemented consistently to eliminate the difference in opinion and approach. Personnel are courteous, professional, and try to ask the right questions when obtaining and documenting information.
2. Screening is based only on criteria that can be verified. Management must be able to defend screening decisions with documentation, which has been properly recorded, dated, and signed.
3. *Keystone/Stonehaven Apartments* can request health information only when the applicant requests a unit designed for persons with disabilities or claims a preference for persons with disabilities. In such cases, management will

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.

4. An applicant may be screened on actions or behavior in previous housing that relate to potential compliance with essential lease provisions. Essential lease provisions are provisions which, if violated, could result in eviction. Information related to assessing the conduct of the applicant and other family members listed on the application, in present or prior housing, is some information considered in screening.

Relevant information respecting the habits or practices to be considered may include, but is not limited to:

1. An applicant's past performance in meeting financial obligations, especially rent.
2. A record of disturbance of neighbors, destruction of property, or living or housekeeping habits at prior residences which may adversely affect the health, safety, or welfare of other tenants or neighbors.
3. Involvement in criminal activity on the part of any applicant family member involving crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity which would adversely affect the health, safety, or welfare of other tenants. (Anti-Drug Act of 1988).
4. Are subject to a state lifetime sex offender registration program.
5. Abuse or pattern of abuse of alcohol interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents. (24 CFR part 5, subpart 1 and J)
6. The screening of live in aides at initial occupancy, and the screening of persons or live in aides to be added to the tenant household after initial occupancy involve similar screening. Both live in aides and new additions to the tenant household will be screened for drug abuse and other criminal activity.
7. A record eviction from housing or termination from residential programs (taking into account date and circumstances).
8. An applicant's ability and willingness to comply with the terms of the HUD lease. (required 24 CFR 8.2)
9. An applicant's misrepresentation of any information related to eligibility, award of preference for admission, allowances, family composition, or rent.
10. Care for the unit, keeping it clean, safe and sanitary, and reporting maintenance needs in a timely fashion.

11. Avoid vandalism to grounds or common areas or damage to unit
12. Comply with reasonable rules established by HUD and the owner.
13. Not to adversely affect the physical environment or financial stability of the project..

The applicant's willingness to pay rent in a timely manner, care for the unit with or without assistance, and abide by the lease may be determined by contacting current and previous landlords.

Keystone/Stonehaven Apartments 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, *Keystone/Stonehaven Apartments* 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, Keystone/Stonehaven Apartments cannot require prospective tenants to undergo physical examinations.

Keystone/Stonehaven Apartments shall use the following **EIV Tenant Search** Report when screening Applicants for occupancy:

EIV existing tenant search: Search will be completed at the time of application for all household members listed on the application to:

1. Discuss with the applicant if the report identifies that the applicant or a member of the applicant's household is residing at another location, giving the applicant the opportunity to explain any circumstances relative to his/her being assisted at another location. This may be a case where the applicant wants to move from his/her present location or where two assisted families share custody of a minor child.
2. Follow up with the respective Property Manager or Managing Agent to confirm the individual's program participation status before admission, if necessary, depending on the outcome of the discussion with the applicant. The report gives the Managing Agent the ability to coordinate move-out and move-in dates with the Property Manager of Managing Agent of the property at the other location.
3. Retain the search results with the application along with any documentation obtained as a result of contacts with the applicant and the Property Manager of Managing Agent at the other location.

The Keystone/Stonehaven Apartments shall use the following guidelines and/or consider the following factors in screening Applicants for occupancy:

Screen for Credit History

Examining an applicant's credit history is one of the most common screening activities. The purpose of reviewing an applicant's credit history is to determine how well applicants meet their financial obligations.

A credit check can help demonstrate whether an applicant has the ability to pay rent on time.

The Keystone/Stonehaven Apartments shall use two primary sources to determine rental and credit history:

- Obtain two positive landlord references covering a period of five (5) years. Keystone/Stonehaven Apartments shall rely more on former landlords than current landlord. Former landlords do not have a reason to provide misleading information, and therefore may provide accurate references. The landlord verifications will be made during the initial screening process and before an Applicant's name is added to the Waiting List.

A positive landlord reference would include:

- Rent was paid and in a timely manner;
- Applicant must show compliance with facility and lease policies
- Property was left in an acceptable condition with any back balances paid in full.
- In the event that a landlord reference is unavailable or if an Applicant is presently residing with family members the **Rental Reference Verification Form** will be waived.

Secure Screening for Credit and Criminal Background Checks

Keystone/Stonehaven Apartments will order credit and criminal background reports for each Applicant. These companies charge a fee for this service but cannot pass the fee/charge to the applicant.

Review the report to determine the applicant's history of meeting financial obligations including payments for rent, utilities, loans, revolving credit cards and other obligations. Verify that no collection or outstanding balance due for rental or housing related activity such as utility payments or property management companies, or eviction.

Administrator may reject an applicant for a poor credit history, but must not reject an applicant for lack of a credit history. Applicants with poor or unacceptable Credit Histories may still be permitted to have their names added to the waiting list. Consideration will be granted on the Person's individual situation. The Applicant's will be given an opportunity to provide an explanation and request further consideration.

Examples of unacceptable credit history is one that reflects the following:

- Consistent, past-due payments of more than 90 days; A history of repeated insufficient fund checks;
- Derogatory credit (repossessions, foreclosures, judgments, collections, charge-offs, liens, bankruptcy not yet discharged, etc.);
- Delinquent or charge off debt due other apartment communities; Unpaid utility company collections which would prohibit applicant from obtaining services.
- Failure to cooperate with re-certification procedures
- Violation of house rules
- Previous evictions for lease violations
- History of disruptive behavior
- Poor housekeeping practices
- Any household member who has a history or pattern of alcohol abuses and whose behavior would interfere with others' health, safety and right to peaceful enjoyment.
- Any household member currently engaging in or has engaged in violent criminal activity or other criminal activity that would threaten the health, safety, or right to peaceful enjoyment of the premises by other residents, or the site's employees, contractors, or agents
- Termination of assistance for fraud
- A household in which any member is currently engaged in illegal use of drugs or for which the owner has reasonable cause to believe that a member's illegal use or pattern of illegal use of a drug may interfere with the health, safety, and right to peaceful enjoyment of the property by other residents;
- Any household member is a convicted felon or convicted of repeated misdemeanors
- Any household member who is subject to a state sex offender lifetime registration requirement

There are two exceptions to the above provisions allowed by HUD:

- The evicted household has successfully completed an approved, supervised drug rehabilitation program, **OR** the circumstances leading to the eviction no longer exist (e.g., the household member no longer resides with the applicant household).
- The owner shall require written evidence that the members of the household are not and have not engaged in criminal activity for a reasonable period of time – seven (7) years or longer. The owner shall require the household member to submit documentation to support the reconsideration of the decision which includes:
 - 1) A certification that states that she or he is not currently engaged in such criminal activity and has not engaged in such criminal activity for seven (7) years or longer.
 - 2) Supporting information from such sources as a probation officer, social service agency worker or criminal record(s) that can be verified by the owner.

REJECTIONS

Applicants may be rejected if they:

- 1) Are ineligible based on financial prerequisites or because they are not members of a group *Keystone/Stonehaven Apartments* was designed to serve.
- 2) Fail to meet the owner's tenant selection criteria.
- 3) Are unable to disclose and document Social Security numbers or execute a certification when numbers have not been assigned.
- 4) Fail to meet HUD's criteria.
- 5) Fail to allow a HUD required criminal history background check in the state(s) where the housing is located and in other states where the household members are known to have resided.

Some examples of the rejections listed above are as follows:

- 1) This is an "elderly" project and the applicant is not 62 years of age or older or the applicant is under 62 years of age and is not mobility impaired.
- 2) The family income (using the HUD definition of income) is over the applicable income limits published by HUD.
- 3) Negative references from current and previous landlords.
- 4) Submission of false or untrue information on the application, or failure to cooperate in the verification process.
- 5) The household size (including a live-in aide) is not appropriate for this unit.
- 6) Failure to sign designated forms and/or documents upon request.
- 7) The applicant has a pet that does not conform to management or HUD rules and regulations. Assistive animals are not considered pets.
- 8) This is not the applicant's only residence.
- 9) The applicant is not capable of fulfilling the lease agreement, with or without assistance.
- 10) The applicant has a history of non-payment of rent or of being evicted for non-payment.
- 11) Any one conviction of a felony.
- 12) Any conviction for the use, distribution, or manufacturing of any controlled substance.

- 13) Any household in which any member is currently engaged in illegal use of drugs for which the owner has reasonable cause to believe that a member's illegal use or pattern of illegal use of a drug may interfere with the health, safety, and right to peaceful enjoyment of the property by other residents.
- 14) Any household containing a member(s) who was evicted in the last three years from federally assisted housing from drug-related criminal activity.
- 15) Any household member who is subject to a state sex offender lifetime registration requirement.
- 16) Any household member if there is reasonable cause to believe that member's behavior, from abuse or pattern of abuse of alcohol, may interfere with health, safety, and right to peaceful enjoyment by other residents. Screening will be based on behavior, not the condition of alcoholism or alcohol abuse.
- 17) 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.
- 18) Failure to submit certificate of proof of "preference status" upon request.
- 19) The applicant cannot pay the security deposit at move-in. It is important to remember that the applicant has rights during the entire process, and is to always be treated courteously and fairly. All criteria are to be applied equally to all applicants.

PROCEDURES:

When an application is rejected by management, 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 management 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 *Keystone/Stonehaven Apartments* within 14 days of the applicant's receipt of the rejection notice. The requested meeting will be held by management within a reasonable period of time (usually 5 to 7 days), and is to be held by a "disinterested" third party. After the meeting, the applicant is notified in writing within 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.

OFFERING A UNIT

*Offering a Unit - When a unit becomes available for occupancy, it will be offered either to the first Extremely Low-income applicant on the Waiting List, or, if the income-targeting percentage has already been met, to the first applicant at the top of the Waiting List. If the applicant cannot be contacted within five (5) working days, the offer will be canceled and the unit will be offered to the next applicant on the Waiting List. In that event, the first applicant will be sent a letter requesting confirmation of their interest in remaining on the Waiting List. If the applicant replies affirmatively, their application will retain its position on the Waiting List. The applicant will be advised at that time that if another unit becomes available and they cannot be reached within five (5) working days, their name will be moved to the bottom of the waiting list. If the applicant's reply is negative, or if no reply is received within five (5) working days, the application will be withdrawn.

- OR -

When a unit becomes available, in-place residents requiring a unit with accessible features will be housed appropriately before the unit is offered to an applicant on the waiting list. If there are no in-place residents in need of the accessible unit, the unit may be offered to an applicant on the waiting list, pending eligibility certification.

If an applicant on the waiting list is offered a unit and refuses the unit, the following procedure is followed:

1. The applicant is advised in writing that a one-time refusal of the unit places her/his name at the bottom of the list with a new chronological date and time being the date of the refusal.
2. If an applicant refuses a unit twice, the applicant is removed from the waiting list, and is notified in writing of the removal and advised to reapply at a later date.

PREFERENCES

UNITS DESIGNED SPECIFICALLY FOR ELDERLY OR HANDICAPPED/DISABLED PERSONS:

The owner must give preference to households whose head or spouse is a member of the group for which the units were designed.

When choosing among eligible applicants, Keystone/Stonehaven Apartments must apply these preferences in the following order:

- 1) Preference established by the statute governing the program under which assistance is provided.
- 2) Preferences based on HUD rules.
- 3) Preferences based on state or local law.
- 4) Additional owner-established preferences specified in the owner's Tenant Selection Criteria and consistent with nondiscrimination and equal opportunity requirements.

FAIR HOUSING AND EQUAL OPPORTUNITY REQUIREMENTS

It is illegal to base resident selection on race, religion, color, creed, ethnicity, nation origin, sex, sexual orientation, gender identity, familial status, or handicap. It is also illegal to reject an applicant solely because he or she is handicapped, although it may not be possible to admit handicapped residents to certain units. Individuals with handicaps qualify for housing need based on "basic eligibility requirements that govern eligibility for admission." 42 U.S.C. 3601-3619; 24 CFR Part 100.202, 29 U.S.C. 794:24 CFR Part 100.202, 29 U.S.C. 794, 24 CFR Subtitle A, Part 8.3 (c) and 8.4. Regulations implementing the Fair Housing Amendments Act of 1988 prohibit discriminatory conduct on the basis of "handicap" related to advertising for the rental of housing and require owners to market their property (s) to reasonably ensure the handicapped individuals who may be qualified for the housing have an opportunity to apply for the housing. 42 U.S.C. 3601-3619: CFR 100.75. An owner can not determine if a handicap person is eligible for the handicap program based on his/her ability to "take care of himself/herself or the unit"; the handicap person makes that determination.

NONDISCRIMINATION STANDARDS

- 1) There is no assigning of minorities to designated units or sections of this project.
- 2) There will be no renting of 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 handicap within the guidelines of the housing program. *Keystone/Stonehaven Apartments* does not deny qualified individuals housing or any other benefits on the basis of their handicaps. 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 has a handicap or the nature or severity of such a handicap, provided that Keystone/Stonehaven will verify the applicant's need for the architectural features of a mobility impaired unit if one is requested.

- 6) There is a minimum age necessary for normal eligibility requirements, but no maximum age in this program.
- 7) No discrimination based on race, color, creed, national origin, religion, familial status, sex, sexual orientation, ethnicity, national origin, or handicap.
- 8) No priorities or application criteria (i.e. variations in charges or deposits) are based on race, creed, color, religion, sex, sexual orientation, national origin, familial status, or handicap.
- 9) No limits are set on the number of one minority or another to be selected for tenancy.
- 10) There is no segregation on the basis of disability.
- 11) No inquiries can be made to determine if a person is disabled, or to determine the nature or severity of a disability, provided that *Keystone/Stonehaven Apartments* will verify the need for the architectural features of a mobility impaired unit.
- 12) No prospective tenants can be required to undergo physical examinations.
- 13) *Keystone/Stonehaven Apartments* does not require donations, contributions, or membership fees as a condition of admission.
- 14) There is no segregation on the basis of income.
- 15) *Keystone and Stonehaven Apartments* does not discriminate on the basis of disability status in the admission or access to, or treatment or employment in, its federally assisted programs and activities.

Violence Against Women Act (VAWA) Protections:

Owner policies must support or assist victims of domestic violence, dating violence or stalking and protect victims, as well as members of their family, from being denied housing or losing their HUD assisted housing as a consequence of domestic violence, dating violence or stalking (Chapter 4-4C(9)).

Owners must provide notice to Section 8 tenants of their rights and obligations under VAWA (Chapter 4-4C(9)(a)).

Owners must provide tenants the option to complete the Certification of Domestic Violence, Dating Violence or Stalking, form HUD-91066. (Chapter 4-4C(9)(b)(1)).

OCCUPANCY STANDARDS

In developing Occupancy Policy/Standards for Keystone/Stonehaven Apartments (“management” or “facility”), it is recognized that local practices may vary significantly. Management does not allow occupancy, which exceeds that which is allowable under local law. Management agents are permitted to set maximum Occupancy Policy/Standards, which are more restrictive than the applicable codes.

PRINCIPLES

- 1) Each individual will be treated on his/her merits, without presumption of his or her abilities based on race, religion, sex, sexual orientation, gender identity, age, national origin, disability or familial status, recognizing specific program requirements may limit eligibility under law
- 2) Management is obligated to:
 - a. provide decent, safe and sanitary housing; and
 - b. comply with housing assistance program requirements

(NOTE: In the event of failure to comply with these obligations, tenants may avail themselves of appropriate remedies for redress, such as grievance procedures, provided by law.)

- 3) Lease terms, house rules and other policies governing tenancy must be applied uniformly to all tenants.
- 4) Management must enforce essential performance-based lease requirements and may seek appropriate remedies up to and including evictions.
- 5) Management will provide timely, effective and adequate notices and an appropriate opportunity for review of its decisions that affect tenants, including responses to tenant requests for reasonable accommodations.
- 6) Management will seek information necessary to meet program requirements in the least intrusive way possible. Management will protect the confidentiality of information provided by tenants and respect the individual privacy of tenants consistent with program requirements. Similarly, landlords have an obligation to inform local authorities when they have a reasonable suspicion that a tenant:
 - a. Is engaged in illegal or potentially illegal activity on the premises.
 - b. Represents an immediate danger to himself/herself or others.
 - c. May be in danger or harmed by someone else on the premises.

- 7) The tenant’s essential requirements of occupancy include the following:

- a. Timely payment of rent.
- b. Maintain their unit in a safe, decent and sanitary condition.
- c. Not unduly disturb or endanger neighbors, or infringe on their right to quiet enjoyment of their apartment and related premises.
- d. Refrain from on-site criminal activity or participation in criminal activity that affects the housing in any way, including the sale, use or manufacture of drugs in or around the premises.
- e. Comply with the housing assistance program requirements.
- f. Abide by all terms of the lease and the House Rules.

STANDARDS

Congress prohibits HUD from establishing national occupancy standards. Therefore, management has a right to set reasonable standards regarding household size versus unit size. HUD has no program requirements concerning how many persons can share a bedroom. All persons who occupy a unit at this facility must be eligible for the program per HUD Handbook 4350.3, and management's Tenant Selection Criteria.

These Occupancy Policy/Standards can not, will not, and do not unfairly restrict the housing opportunities of families with children who qualify and meet all of the criteria for occupancy. Nor does it restrict housing opportunities to persons with disabilities who require the specific features of the accessible units and who qualify and meet all of the criteria.

NUMBER OF OCCUPANTS PER UNIT

In determining family size, management will count the number of full-time members of the household, children who will reside in the unit, and live-in attendants. The appropriately sized unit for the applicant's household must be available within the facility. This facility has only one-bedroom units; therefore, no consideration can be given to families who may qualify for more than one bedroom type (2 or 3 bedrooms).

In developing occupancy standards, management considers the relationship and sex of the persons in the household. No more than two persons are required to share a bedroom. Unrelated adults and persons of the opposite sex (other than spouses) should not be required to share a bedroom. A child may share a bedroom with a parent or guardian if they so desire. Management may not provide bedroom space for adults who are not members of the household such as children in active military, institutionalized family members, or friends.

	No. of Bedrooms	Minimum Persons	Maximum Persons
Household with Spouse	1	2	2
Household without Spouse	1	1	2
Household With Children (under 18)	1	2	2
Household With Live-In Attendant	1	2	2

No adult is allowed to live in the unit if they are not signed on the lease (except qualified live-in aides). Any adult member added to the lease after the initial move-in must also meet the requirements of the Tenant Selection Criteria. If a household member dies, the remaining person on the lease is permitted to remain in the unit.

Any tenant who has a child under 18, who is the legal guardian, or the child is in their custody as approved by the courts, is permitted to have the child share a bedroom with them at this facility if the tenant desires. If the tenant dies, the child under 18 will have to move from the unit.

Management will accept a child of a tenant/applicant with disabilities, and the child can share the bedroom with the parent, if the parent so chooses. The tenant/applicant with disabilities under 62 must require the accessible features of the handicap unit.

A live-in attendant is not a part of the household or the lease. The attendant is counted as one of two persons per unit. If the tenant moves out of facility or dies, the attendant cannot remain in the unit. A live-in aide qualifies for occupancy only as long as the individual tenant needs support services and may not qualify for continued occupancy as a remaining family member.

Accessible units are assigned in the following order:

- 1) To a current tenant household that includes a member with a disability requiring the accessibility features of the unit.
- 2) To the next eligible, qualified applicant on the facility's waiting list who has a preference required by the program under which our facility is assisted and who has a disability requiring the special accessibility features of the unit.
- 3) To disabled applicants who have no preference.
- 4) To eligible applicants on the chronological waiting list.

If there is neither a current tenant nor a qualified applicant with disabilities requiring the accessibility features of the unit, the unit may be offered to a non-disabled applicant. However, the household occupying the accessible unit will move to a non-accessible unit when one becomes available to give the accessible unit to an applicant/tenant who requires the features of the accessible unit. This unit transfer is an addendum to the Lease. The facility accepts responsibility for this type of move.

OVERCROWDING

Units shall be considered overcrowded if the household would be considered too large for the unit. A household which increases in size to more than two persons would be considered overcrowded, and in violation of the Occupancy Policy/Standards. Additional data on two persons per unit is found in HUD Handbook 4350.3 and the lease.

UNDERUTILIZATION

If a household decreases in size from two persons to one, the remaining tenant can stay in the unit. See HUD Handbook 4350.3, paragraph 2-19, and the lease.

Management makes every effort to place two persons in a unit when possible. The reason for this is to optimize the use of scarce subsidy resources.

REASONABLE ACCOMMODATIONS

Landlord (management) obligations to tenants and applicants, are determined by law. Management has several obligations to its tenants and applicants, which are defined in various statutes. Under federal law, landlords are required to seek a reasonable accommodation in rules, policies, procedures and operations to allow a qualified individual with disabilities an opportunity to equally enjoy or participate in the housing program. Accommodations are considered reasonable if they do not impose an undue burden on management, and if they would not constitute a fundamental alteration to the nature of the program. {42 U.S.C. 3601-3619; 24CFR Part 100.204; 29 U.S.C. 794; 24 CFR Subtitle A, Part 8.11}

The concept of reasonable accommodation involves helping a tenant, when possible, by accessing resources in the community enabling them to meet essential requirements of occupancy; it does not require the lowering or waiving of genuinely essential requirements. Accommodations are not reasonable if they require a fundamental alteration in the nature of the program or impose undue hardship and administrative burdens on management.

Reasonable accommodations might include any and all of the services specifically designed to establish and/or maintain lease compliance. Examples of services would be housekeeping assistance, assistance with making rental payments, and related services. Within the social service context, supportive services may be necessary as reasonable accommodations and are generally defined as services to help support the efforts of an individual or family with physical, mental or emotional impairments (regardless of one's classification as elderly, disabled, etc.) to help them live within the community. Such support services might include special devices and aids, health and mental health services, rehabilitative services, vocational training, medication management, personal assistance and related services.

Reasonable structural modifications to housing units or common areas are given consideration. Examples of structural modifications include installing ramps and widening doors (to accommodate wheelchair users), installing visual fire alarms (to accommodate persons with

hearing impairments), and installing a Braille control panel in an elevator or common areas (to accommodate persons with visual impairments).

Regulation 24CFR 8.6 is in effect at this facility. An operable TDD phone is located in the reception area or office.

VERIFICATION OF REASONABLE ACCOMMODATION REQUESTS

When management receives a request for reasonable accommodation, management will communicate with the tenant/applicant advising him/her that the request will be considered subsequent to the return of the verification. The verification will state the reasonable accommodation requested, and will ask the receiving party to affirm that the tenant/applicant requires the accommodation requested. The verification form will not contain inquiries which may tend to disclose the nature or extent of the individual's disability, or other confidential medical information.

The verification should be sent to an individual or firm of the applicant/tenant's choice, and should be completed by an individual who, in their professional capacity, is familiar with the circumstances of the applicant/tenant. This professional person does not have to be a physician. Requests for reasonable accommodation are confidential and are handled in accordance with properly established procedures for the safeguarding of such information.

TRANSFER OF APARTMENTS

It is the intention of management to provide decent and sanitary housing to all eligible and qualified applicants and tenants. While management understands that there may be instances and circumstances which make a apartment transfer desirable, the cost in lost rental income and unit rehabilitation limits the acceptable reasons for granting such requests. Tenants requesting an apartment transfer must provide the CEO with acceptable documentation from a qualified professional stating that such a transfer is necessary to the tenant's health and well being, or that the tenant otherwise requires the specific architectural features of an accessible apartment. The acceptability of the documentation provided will be determined at the discretion of the CEO, subject only to applicable laws and regulations. If the documentation is acceptable, the tenant will be offered the next appropriate apartment that becomes available. In the event of such a move, the cost of moving and labor are the responsibility of the tenant. If the tenant refuses the offered apartment, acceptable documentation from the qualified professional stating why the apartment is unacceptable is required in order for the tenant to be offered another apartment.

For a tenant-initiated transfer, the tenant may have to pay for apartment rehabilitation charges resulting from such move. A tenant should occupy an apartment for six months before considering a transfer. Management may request a tenant move from an accessible unit to a non-accessible unit in order to give the person with disabilities the unit with the accessible features. In this latter case, management will help coordinate the move and take responsibility for the costs of moving.

Keystone Apartments consists of a combination of studio and one-bedroom apartments. Applicants on the waiting list are offered apartments, as they become available. In most cases the available unit is a studio. Applicants can refuse the studio if they wish a one-bedroom apartment. Residents who have accepted a studio apartment but wish a one-bedroom unit when available are put on an internal waiting list. Those applicants wanting a one-bedroom are kept on the waiting list and remain so until residents in a studio unit who are on a transfer list for a one-bedroom unit have been placed. Stonehaven consists of all one-bedroom units.

An internal waitlist will be kept for current residents. Those residents will receive preference when a unit becomes available and they are over/under housed in their current unit.

Current residents who are Victims of domestic violence; dating violence, sexual assault or stalking will receive preference when qualified for an emergency transfer.

POLICIES FOR OPENING AND CLOSING THE WAITING LIST FOR THE PROPERTY

Ames Ecumenical Housing, Inc. shall monitor the vacancies at the property and the waiting list regularly to ensure that there are enough applicants to fill the vacancies. If there aren't enough applicants to fill potential vacancies, the Owner will not close the waiting list.

Furthermore, Ames Ecumenical Housing, Inc. shall monitor the waiting list to make sure that they do not become so long that the wait for a unit becomes excessive. The methods of advertising used to announce opening and closing of the waiting list should be described.

- The waiting list may be closed for one or more unit sizes when the average wait is excessive (e.g., one year or more occupancy needs).
- When the Owner closes the list, Ames Ecumenical Housing, Inc. must advise potential applicants that the waiting list is closed and refuse to take additional applications.
- The waiting list may be closed for a specific unit size or type if the projected turnover rate indicates that an applicant would be unable to obtain a unit within one year. Before closing a waiting list, the Administrator must post a notice at the Project(s) that indicates: (a) the date the list will be closing and (b) Ames Ecumenical Housing, Inc.'s telephone number, fax number and TDD number for verification. Notice must be in 14 point (or larger) print and in an accessible location(s). The Administrator shall further publish a notice in a publication likely to be read by potential applicants stating that the Project(s) will no longer accept applications and the reasons therefore.
- When an applicant pool is not large enough to warrant the closure of the waiting list, the list shall be re-opened. Ames Ecumenical Housing, Inc. must provide written notification of the list's reopening, and public notice shall be placed in area publications and as otherwise required by the Project's Affirmative Fair Marketing Plan. The public notice should include rules for applying and the order in which applications will be processed.

The dates, times, address where families may apply. The notices will provide potential Applicants with information that includes the project's address and telephone number, management contact information, how to submit an application, information on eligibility requirements.

Upon request from a person with a disability, additional time will be given as a reasonable accommodation for submission of an application after the closing deadline. This reasonable accommodation is to allow persons with disabilities the greatest possible opportunity to submit an application.

UPDATING THE WAITING LIST

Any application meeting the requirements as stated in the **Project Eligibility** and preliminary **Applicant Screening Criteria** sections will be placed on the wait list by Ames Ecumenical Housing, Inc.

One's place on the waiting list is determined by the date on which all application materials are received at the office; however, acceptance to the waiting list **does not** automatically guarantee eligibility for an apartment. Further screening as described in the applicant screening criteria section will be completed at the time an apartment is offered.

- The initial application shall be timed and dated when received.
- It is the responsibility of the Applicant to contact Ames Ecumenical Housing, Inc. every 6-months to remain current on the waiting list.
- Applicants on the waiting list are required to recertify their income annually in order to remain on the waiting list.
- Ames Ecumenical Housing, Inc Administrator will update this information concurrently with the Annual Income Re-certification performed for residents currently residing at the project.

TENANT SELECTION PLAN

The **Administrator of Ames Ecumenical Housing, Inc.** shall review/update the TSP at least annually to ensure that it reflects current operating practices, program priorities and HUD requirements.

POLICIES FOR NOTIFYING APPLICANTS OF CHANGES IN THE TENANT SELECTION PLAN

- The Administrator shall send to all applicants on the waiting by snail mail (U.S. postal system), a letter indicating that a change has been made in the Owner's Tenant Selection Plan.
- The Administrator shall retain copies of such notices attached to each applicant's application form/attachments.
- The Administrator shall provide copies of the Tenant Selection Plan to waiting list applicants.
- A copy of the TSP shall also be made available on the Project's website.

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