

Chapter 4

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

When a family wishes to reside in public housing, the family must submit an application that provides the PHA with the information needed to determine the family's eligibility. If the family is eligible, they will be placed on the PHA's waiting list. When a unit becomes available, the PHA must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in its Admissions and Continued Occupancy Policy (ACOP) and its annual plan.

The PHA is required to adopt a clear approach to accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA to receive preferential treatment.

HUD regulations require that the PHA comply with all equal opportunity requirements and it must affirmatively further fair housing goals in the administration of the program [24 CFR 960.103, PH Occ GB p. 13]. Adherence to the selection policies described in this chapter ensures that the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and PHA policies for accepting applications, managing the waiting list and selecting families from the waiting list. The PHA's policies for assigning unit size and making unit offers are contained in Chapter 5. Together, Chapters 4 and 5 of the ACOP comprise the PHA's Tenant Selection and Assignment Plan (TSAP).

The policies outlined in this chapter are organized into three sections, as follows:

Part I: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how the PHA will handle the applications it receives.

Part II: Managing the Waiting List. This part presents the policies that govern how the PHA's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for public housing. It also discusses the process the PHA will use to keep the waiting list current.

Part III: Tenant Selection. This part describes the policies that guide the PHA in selecting families from the waiting list as units become available. It also specifies how in-person interviews will be used to ensure that the PHA has the information needed to make a final eligibility determination.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the policies for making applications available, accepting applications, making preliminary determinations of eligibility, and the placement of on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process.

4-I.B. APPLYING FOR ASSISTANCE

Any family that wishes to reside in public housing must apply for admission to the program [24 CFR 1.4(b)(2)(ii), 24 CFR 960.202(a)(2)(iv), and PH Occ GB, p. 68]. HUD permits the PHA to determine the format and content of its applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. The PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application [Notice PIH 2009-36].

UHA Policy

Depending upon the length of time between the date of application and the availability of housing,, the UHA may use a one- or two-step application process.

A one-step process will be used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and the amount of rent the family will pay.

A two-step process will be used when it is expected that a family may not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the UHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list (pre-application form). This information will be obtained from the family via a pre-application form. Information needed to make an initial assessment of eligibility and determine placement on the waiting list includes:

Current residence address: the family may not provide another address or a mailing-only address, such as a P.O. Box, in lieu of the physical address of their place of residence. A P.O. Box or mailing-only address will be accepted only if the Postal Service will not deliver mail to the physical address;

At time of selection from the waiting list, the family will be required to provide all of the information necessary to establish family eligibility and the amount of rent the family will pay. The information will be obtained from the family via a full application form.

Pre-applications must be submitted online, unless the applicant requests and is approved for a reasonable accommodation for a person with disabilities (see 4-I.C. - Accessibility of the Application Process). Pre-applications must be submitted to the UHA in the format prescribed by the UHA in the instructions provided to applicants. Instructions may be provided via the pre-application form and/or accompanying documents, the public announcement regarding the waiting list opening, the UHA's website, flyers, and/or other forms of announcement.

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The UHA will deny any pre-application that does not include all information required by the UHA and/or program regulations. The UHA shall have the discretion to determine the information that is required to be provided.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

The PHA must take steps to ensure that the application process is accessible to those people who might have difficulty complying with the standard PHA application process.

Elderly and Disabled Populations [24 CFR 8; PH Occ GB, p. 68]

The PHA must provide reasonable accommodation as needed for persons with disabilities to make the application process fully accessible.. The facility where applications are accepted and the application process must be fully accessible, or the PHA must provide an alternate approach that provides equal access to the program. Chapter 2 provides a full discussion of the PHA's policies related to providing reasonable accommodations for people with disabilities.

UHA Policy

If a person with disabilities is unable to complete the online pre-application process due to the nature of their disability, they may request a reasonable accommodation for assistance with the application process. UHA will accept reasonable accommodation requests from the time that the formal announcement of the waiting list opening is made until the waiting list closes. Requests for reasonable accommodations received before or after this time period will not be approved. In order to prevent delay in the pre-application process for these individuals, UHA will not verify with a third party the individual's need for a reasonable accommodation.

As a reasonable accommodation, UHA may allow the applicant to submit a pre-application using a paper copy of the pre-application form. The applicant will be required to use the UHA's pre-application form. The applicant must return the completed paper pre-application form to UHA by mail before the deadline specified by the UHA.

Limited English Proficiency

PHAs are required to take reasonable steps to ensure equal access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on the PHA's policies related to ensuring access to people with limited English proficiency (LEP).

4-I.D. PLACEMENT ON THE WAITING LIST

The PHA must review each completed application received and make a preliminary assessment of the family's eligibility. Applicants for whom the waiting list is open must be placed on the waiting list Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 960.208(a); PH Occ GB, p. 41].

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list.

Ineligible for Placement on the Waiting List

UHA Policy

If the UHA determines from the information provided that a family is ineligible, such as if the family's reported annual income exceeds the income limit for the family, UHA will deny the family and the family will not be placed on the waiting list. When a family is determined to be ineligible, the UHA notify the family in writing of the denial in accordance with Chapter 3-III of this policy.. The notice will state the reasons for denial, and will inform the family of its right to request an informal hearing and explain the process for doing so (see Chapter 14).

Eligible for Placement on the Waiting List

UHA Policy

If the UHA determines from the information provided via the pre-application that a family appears to be eligible for assistance, the family will be placed on the waiting list. Placement on the waiting list does not indicate that the family is, in fact, eligible for admission. When the family is selected from the waiting list, the PHA will verify any preference(s) claimed and determine eligibility and suitability for admission to the program. Eligible applicants will be placed on the waiting list according to any preference(s) which they claim at the time of pre-application. New pre-applications will be merged with existing pre-applications in a single waiting list.

The UHA will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards (see Chapter 5). Families may request to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines (as long as the unit is not overcrowded according to UHA standards and local codes). However, in these cases, the family must agree not to request a transfer for two years after admission, unless they have a change in family size or composition.

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA must have policies regarding the type of waiting list it will utilize as well as how the waiting list will be organized and managed. This includes policies on notifying the public on the opening and closing of the waiting list to new applicants, updating family information, purging the list of families that are no longer interested in or eligible for public housing, and conducting outreach to ensure a sufficient number of applicants.

In addition, HUD imposes requirements on how the PHA may structure its waiting list and how families must be treated if they apply for public housing at a PHA that administers more than one assisted housing program.

4-II.B. ORGANIZATION OF THE WAITING LIST

The PHA's public housing waiting list must be organized in such a manner to allow the PHA to accurately identify and select families in the proper order, according to the admissions policies described in this ACOP.

UHA Policy

The waiting list will contain the following information for each applicant listed:

- Name and social security number of head of household
- Unit size required (number of family members)
- Amount and source of annual income
- Accessibility requirement, if any
- Date and time of application or application number
- Household type (family, elderly, disabled)
- Admission preference, if any
- Race and ethnicity of the head of household

HUD requires that public housing applicants must be offered the opportunity to be placed on the waiting list for any tenant-based or project-based voucher or moderate rehabilitation program that the PHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs [24 CFR 982.205(a)(2)(i)].

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs [24 CFR 982.205(a)(1)].

UHA Policy

UHA will not merge the public housing waiting list with the waiting list for any other program the UHA operates.

4-II.C. OPENING AND CLOSING THE WAITING LIST

Closing the Waiting List

The PHA is permitted to close the waiting list, in whole or in part, if it has an adequate pool of families to fully lease units in all of its developments. The PHA may close the waiting list completely, or restrict intake by preference, type of project, or by size and type of dwelling unit. [PH Occ GB, p. 31].

UHA Policy

The UHA may close the waiting list when the estimated waiting period for housing applicants on the list reaches 24 months for the most current applicants. Where the UHA has particular preferences or other criteria that require a specific category of family, the UHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

If the waiting list has been closed, it may be reopened at any time. The PHA should publish a notice announcing the opening of the waiting list in local newspapers of general circulation, minority media, and other suitable media outlets. Such notice must comply with HUD fair housing requirements. The PHA should specify who may apply, and where and when applications will be received.

UHA Policy

The UHA will announce the reopening of the waiting list at least 15 calendar days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.

The UHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

- Daily Bulletin Newspaper
- Department of Public Social Services
- Employment Development Department
- Social Security Administration
- Other PHA Offices in the area
- Other social services agencies in the area, such as Inland Valley Recovery Services

To reach persons with disabilities, the UHA will provide separate notice to local organizations representing the interest and needs of the disabled, such as Easter Seals of the Inland Empire.

4-II.D. FAMILY OUTREACH [24 CFR 903.2(d); 24 CFR 903.7(a) and (b)]

The PHA should conduct outreach as necessary to ensure that the PHA has a sufficient number of applicants on the waiting list to fill anticipated vacancies and to assure that the PHA is affirmatively furthering fair housing and complying with the Fair Housing Act.

Because HUD requires the PHA to admit a specified percentage of extremely low income families, the PHA may need to conduct special outreach to ensure that an adequate number of such families apply for public housing.

PHA outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

PHA outreach efforts must be designed to inform qualified families about the availability of units under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

UHA Policy

The UHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in the UHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

UHA Policy

While the family is on the waiting list, the family must immediately inform the UHA of changes in household size or composition, or contact information (including current residence and phone number). The changes must be submitted in writing within fifteen (15) calendar days of the date of the change using the form prescribed by UHA. When an applicant reports a change in contact information, the waiting list will be updated accordingly.

The family may also report other changes at any time while on the waiting list, including changes to household size or composition, preference status, and/or household income.

The family will not be permitted to report changes in household size or composition (add new household members not included on the family's pre-application or updates to the family's pre-application) after the family has been selected from the waiting list, except:

The family may add children who joined the family as a result of birth, adoption, or court-awarded custody;

The family may add other household members who were residing with the family prior to the date the family was selected from the waiting list. The family will be required to provide acceptable evidence that the additional household members resided with the family prior to the date the family was selected from the waiting list.

Failure to report changes as required may result in denial or the family being placed back on the waiting list if the family does not qualify for the bedroom size for which they were selected.

4-II.F. UPDATING THE WAITING LIST

HUD requires the PHA to establish policies that describe the circumstances under which applicants will be removed from the waiting list [24 CFR 960.202(a)(2)(iv)].

Purging the Waiting List

The decision to remove an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to the PHA's request for information or updates, and the PHA determines that the family did not respond because of the family member's disability, the PHA must, upon the family's request, reinstate the applicant family to their former position on the waiting list as a reasonable accommodation [24 CFR 8.4(a), 24 CFR 100.204(a), and PH Occ GB, p. 39 and 40]. See Chapter 2 for further information regarding reasonable accommodations.

UHA Policy

The waiting list will be purged and updated at UHA's discretion to ensure that applicant information is current.

To purge and update the waiting list, the UHA will send a notice to all families currently listed as active on the waiting list. The notice will be sent to the family's address of record and will indicate that the family is active on the UHA's waiting list.

The notice will also provide instructions for the family to follow if they wish to be removed from the waiting list.

If the notice is returned by the Post Office, the family will be removed from the waiting list.

When a family is removed from the waiting list during the update process for failure to respond, no informal hearing will be offered. Such failures to act on the part of the applicant prevent the PHA from making an eligibility determination; therefore no informal hearing is required.

The UHA may reinstate a family to the waiting list if the family was removed was due to UHA error.

Removal from the Waiting List

UHA Policy

The UHA will remove an applicant from the waiting list upon request by the applicant family. In such cases no informal hearing is required. UHA will send a letter to the family confirming that they have been removed from UHA's waiting list per the family's request.

If, at any time while an applicant family is on the waiting list, the UHA determines that the family is not eligible for assistance (see Chapter 3), the family will be removed from the waiting list. If a family is removed from the waiting list because the UHA has determined the family is not eligible for admission, a notice of denial will be sent to the family's address of record. The notice will state the reasons the family was removed from the waiting list and will inform the family of its right to request an informal hearing regarding the UHA's decision and explain the process for doing so (see Chapter 14) [24 CFR 960.208(a)].

PART III: TENANT SELECTION

4-III.A. OVERVIEW

The PHA must establish tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)]. The PHA must not require any specific income or racial quotas for any developments [24 CFR 903.2(d)]. The PHA must not assign persons to a particular section of a community or to a development or building based on race, color, religion, sex, disability, familial status or national origin for purposes of segregating populations [24 CFR 1.4(b)(1)(iii) and 24 CFR 903.2(d)(1)].

The order in which families are selected from the waiting list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences for which the family qualifies. The availability of units also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 960.206(e)(2)]. The PHA's policies must be posted any place where the PHA receives applications. The PHA must provide a copy of its tenant selection policies upon request to any applicant or tenant. The PHA may charge the family for providing a copy of its tenant selection policies [24 CFR 960.202(c)(2)].

UHA Policy

When an applicant or resident family requests a copy of the UHA's tenant selection policies, the UHA will provide copies to them free of charge.

4-III.B. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use.

Local Preferences [24 CFR 960.206]

PHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

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UHA Policy

The UHA will offer a local preference to families who meet the following definitions:

Preference	Point Value
<u>Residents of the City of Upland:</u> <ul style="list-style-type: none">• A family whose permanent residence is in the City of Upland;• A family whose head of household, spouse, co-head or sole member is/are employed in the City of Upland or have accepted employment in the City of Upland;• A family whose head of household, spouse, co-head or sole member is/are attending school in the City of Upland;	50
<u>Veterans:</u> <ul style="list-style-type: none">• “veteran” means a person who served in the active military, naval, or air service, and who was discharged or released there from under conditions other than dishonorable. A complete definition of veteran is located at 38 U.S.C. 101;• The surviving spouse of a veteran as defined at 38 U.S.C. 101.	20
<u>Working Family:</u> <ul style="list-style-type: none">• <u>A family whose head of household, spouse, co-head or sole member is employed at least twenty (20) hours per week;</u>• <u>As required by HUD, a family whose head, spouse, co-head or sole member is a person age 62 or older, or is a person with disabilities will also be given the working preference [24 CFR 960.206(b)(2)].</u>	20

Note: a family may only receive each preference one time, regardless of the number of household members eligible for the preference.

Income Targeting Requirement [24 CFR 960.202(b)]

HUD requires that extremely low-income (ELI) families make up at least 40 percent of the families admitted to public housing during the PHA’s fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher [*Federal Register* notice 6/25/14]. To ensure this requirement is met, the PHA may skip non-ELI families on the waiting list in order to select an ELI family.

If a PHA also operates a housing choice voucher (HCV) program, admissions of extremely low-income families to the PHA’s HCV program during a PHA fiscal year that exceed the 75 percent minimum target requirement for the voucher program, shall be credited against the PHA’s basic targeting requirement in the public housing program for the same fiscal year. However, under these circumstances the fiscal year credit to the public housing program must not exceed the lower of: (1) ten percent of public housing waiting list admissions during the PHA fiscal year; (2) ten percent of waiting list admissions to the PHA’s housing choice voucher program during

the PHA fiscal year; or (3) the number of qualifying low-income families who commence occupancy during the fiscal year of PHA public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

UHA Policy

The UHA will monitor progress in meeting the income targeting requirement throughout the fiscal year. ELI families will be selected ahead of other eligible families on an as-needed basis to ensure that the income targeting requirement is met.

Mixed Population Developments [24 CFR 960.407]

A mixed population development is a public housing development or portion of a development that was reserved for elderly families and disabled families at its inception (and has retained that character) or the PHA at some point after its inception obtained HUD approval to give preference in tenant selection for all units in the development (or portion of a development) to elderly and disabled families [24 CFR 960.102]. Elderly family means a family whose head, spouse, cohead, or sole member is a person who is at least 62 years of age. Disabled family means a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403]. The PHA must give elderly and disabled families equal preference in selecting these families for admission to mixed population developments. The PHA may not establish a limit on the number of elderly or disabled families that may occupy a mixed population development. In selecting elderly and disabled families to fill these units, the PHA must first offer the units that have accessibility features for families that include a person with a disability and require the accessibility features of such units. The PHA may not discriminate against elderly or disabled families that include children (Fair Housing Amendments Act of 1988).

Units Designated for Elderly or Disabled Families [24 CFR 945]

The PHA may designate projects or portions of a public housing project specifically for elderly or disabled families. The PHA must have a HUD-approved allocation plan before the designation may take place.

Among the designated developments, the PHA must also apply any preferences that it has established. If there are not enough elderly families to occupy the units in a designated elderly development, the PHA may allow near-elderly families to occupy the units [24 CFR 945.303(c)(1)]. Near-elderly family means a family whose head, spouse, or cohead is at least 50 years old, but is less than 62 [24 CFR 5.403].

If there are an insufficient number of elderly families and near-elderly families for the units in a development designated for elderly families, the PHA must make available to all other families any unit that is ready for re-rental and has been vacant for more than 60 consecutive days [24 CFR 945.303(c)(2)].

The decision of any disabled family or elderly family not to occupy or accept occupancy in designated housing shall not have an adverse affect on their admission or continued occupancy in public housing or their position on or placement on the waiting list. However, this protection does not apply to any family who refuses to occupy or accept occupancy in designated housing because of the race, color, religion, sex, disability, familial status, or national origin of the occupants of the designated housing or the surrounding area [24 CFR 945.303(d)(1) and (2)].

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This protection does apply to an elderly family or disabled family that declines to accept occupancy, respectively, in a designated project for elderly families or for disabled families, and requests occupancy in a general occupancy project or in a mixed population project [24 CFR 945.303(d)(3)].

UHA Policy

The UHA does not have designated elderly or designated disabled housing at this time.

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

UHA Policy

The UHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The UHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

UHA Policy

The UHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The UHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low income family (30% of median income).

Step 4. The UHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the UHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the UHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and UHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the UHA's deconcentration policy. The UHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the UHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the UHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

UHA Policy

UHA has a single public housing complex, this requirement is not applicable

Order of Selection [24 CFR 960.206(e)]

The PHA system of preferences may select families either according to the date and time of application or by a random selection process (lottery).

UHA Policy

Families will be selected from the waiting list based on the income targeting and/or local preference(s) which they claim at the time of selection. Among applicants with the same

preference, families will be randomly selected using UHA's computer waiting list system via a lottery ranking number that is randomly assigned by the computer waiting list system at the time of selection.

When selecting applicants from the waiting list the UHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The PHA will offer the unit to the highest ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with higher preference status.

Factors such as income mixing and income targeting will also be considered in accordance with HUD requirements and PHA policy.

UHA may establish a "ready pool" by selecting one or more applicants from the waiting list in anticipation of potential future vacancies. The purpose of the ready pool is to determine eligibility of one or more applicants from the waiting list in advance of unit availability in order to expedite the admission and unit turnover process. Applicants in the ready pool will be notified of selection and reviewed for program eligibility in accordance with sections 4-III.C, 4-III.D, 4-III.E and other sections of this policy.

4-III.C. NOTIFICATION OF SELECTION

When the family has been selected from the waiting list, the PHA must notify the family.

UHA Policy

The UHA will notify the family by telephone and first class mail when it is selected from the waiting list.

The notice will inform the family of the following:

- Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview

- Who is required to attend the interview

- All documents that must be provided at the interview, including information about what constitutes acceptable documentation

- Documents that must be provided at the interview to document eligibility for a preference, if applicable

If a notification letter is returned to the UHA by the Post Office, the family will be removed from the waiting list. A notice of denial will be sent in accordance with the procedures in Chapter 3. The notice of denial will be sent to the family's address of record or to the family's forwarding address, if one is provided by the Post Office with the returned notification letter.

The Executive Director may reinstate a family to the waiting list if s/he determines the family was removed was due to UHA error or to circumstances beyond the family's control.

4-III.D. THE APPLICATION INTERVIEW

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a private interview. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA [Notice PIH 2012-10].

UHA Policy

UHA will not return the family to its place on the waiting list pending disclosure and documentation of Social Security Numbers.

If the family is unable to disclose and provide the required documentation of SSN at the time of the interview, they will be given 15 calendar days to provide it. If the family is unable to obtain the documentation within the required time frame, the family may request an extension. UHA will grant an extension only as a reasonable accommodation for a person with disabilities or for other good cause. If the required documents and information are not provided within the required time frame (plus any approved extensions), the family will be sent a notice of denial and removed from the waiting list (See Chapter 3)

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability [24 CFR 8.4(a) and 24 CFR 100.204(a)].

UHA Policy

Families selected from the waiting list are required to participate in an eligibility interview.

All adult household members will be required to attend the interview together. The interview will be conducted only if the head of household and spouse/cohead, if applicable, provide appropriate documentation of legal identity (Chapter 7 provides a discussion of proper documentation of legal identity). If the family does not provide the required documentation, a second appointment will be scheduled for the family no less than 15 days and no more than 30 days from the date of the original appointment. If the family fails to provide appropriate documentation of legal identity at the second scheduled appointment, the family will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in Chapter 3. The UHA will provide a third appointment only as a reasonable accommodation for a person with disabilities or for other good cause.

If the family is claiming a waiting list preference, the family must provide documentation to verify their eligibility for a preference (see Chapter 7). If the family is verified as eligible for the preference, the PHA will proceed with the interview. If the UHA determines the family is not eligible for the preference, the interview will not proceed and the family will be placed back on the waiting list according to the date and time of their application.

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The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the UHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 15 calendar days of the interview (. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. UHA will grant an additional extension of time only as a reasonable accommodation for a person with disabilities or for other good cause. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the UHA will provide translation services in accordance with the UHA's LEP plan.

If the family misses or is unable to attend a scheduled interview, , a second appointment will be scheduled for no less than 15 days and no more than 30 days from the date of the original appointment. Applicants who fail to attend two scheduled interviews for any reason will have their applications made inactive based on the family's failure to supply information needed to determine eligibility. The second appointment letter will state that failure to appear for the appointment without a request to reschedule will be interpreted to mean that the family is no longer interested and their application will be made inactive. Such failure to act on the part of the applicant prevents the UHA from making an eligibility determination, therefore the UHA will not offer an informal hearing. The UHA will provide a third appointment only as a reasonable accommodation for a person with disabilities or for other good cause.

4-III.E. FINAL ELIGIBILITY DETERMINATION [24 CFR 960.208]

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information related to the eligibility requirements, including PHA suitability standards, the PHA must make a final determination of eligibility (see Chapter 3).

When a determination is made that a family is eligible and satisfies all requirements for admission, including tenant selection criteria, the applicant must be notified of the approximate date of occupancy insofar as that date can be reasonably determined [24 CFR 960.208(b)].

UHA Policy

The UHA will notify a family in writing of their eligibility and will provide the approximate date of occupancy insofar as that date can be reasonably determined.

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The PHA must promptly notify any family determined to be ineligible for admission of the basis for such determination, and must provide the applicant upon request, within a reasonable time after the determination is made, with an opportunity for an informal hearing on such determination [24 CFR 960.208(a)].

UHA Policy

If the UHA determines that the family is ineligible, the UHA will send written notification of the ineligibility determination (see Section 3-III.G). The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing (see Chapter 14).

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, local preference), the family will be returned to the waiting list. The UHA will notify the family in writing that it has been returned to the waiting list, and will specify the reason(s).

If UHA determines that the family knowingly provided false or fraudulent information on the application form, UHA will deny the family assistance and will not return the family to the waiting list. A notice of denial will be issued in accordance with policies contained in Chapter 3.

If the PHA uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the PHA can move to deny the application. See Section 3-III.G. for the PHA's policy regarding such circumstances.