Tenant Selection & Occupancy Plan
for the following Petra Community Housing (PCH) managed properties:

<table>
<thead>
<tr>
<th>Property Requirements:</th>
<th>Spring City Elderly (a/k/a Flag House)</th>
<th>Gruber Mills (a/k/a Bard Complex)</th>
<th>Freedom House</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>250 N. Main St., Spring City, PA 19475</td>
<td>201 S. Main Street, Spring City, PA 19475</td>
<td>531 Spring Street, Royersford, PA 19468</td>
</tr>
<tr>
<td>Apartments</td>
<td>57 one-Bedroom Units</td>
<td>61 one-Bedroom Units</td>
<td>18 one-Bedroom Units</td>
</tr>
<tr>
<td>HUD Sec. 202 with PRAC Rental Subsidy Program</td>
<td>Elderly only (min. 62 years of age at time of application)</td>
<td>Elderly only (min. 62 years of age at time of application)</td>
<td>n/a</td>
</tr>
<tr>
<td>HUD Sec. 811 with PRAC Rental Subsidy Program</td>
<td>n/a</td>
<td>n/a</td>
<td>Disabled only (permanent disability, min. 18 years age)</td>
</tr>
<tr>
<td>Applicant Income Limits</td>
<td>Up to 50% of Area Median Income</td>
<td>Up to 50% of Area Median Income</td>
<td>Up to 50% of Area Median Income</td>
</tr>
</tbody>
</table>

This Tenant Selection Plan is available to the public upon request, is posted for 30 days before implementing changes, and is subject to annual review to determine if it is in need of being updated. This cover page is posted in each managed property lobby. Questions regarding the Plan and its administration may be directed to the PCH Executive Director.
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<th></th>
<th>Description</th>
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<tbody>
<tr>
<td>1</td>
<td>Reasonable Accommodation Request</td>
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<tr>
<td>2</td>
<td>Application for Housing</td>
</tr>
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<td>3</td>
<td>Asset Divestiture Certification</td>
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<td>4</td>
<td>Release Consent HUD-9887 &amp; 9887-A</td>
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<tr>
<td>5</td>
<td>ADA Unit Addendum</td>
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<td>6</td>
<td>Transfer Request</td>
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<td>7</td>
<td>Live-in Agreement</td>
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<td>8</td>
<td>VAWA Information Notice</td>
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<td>VAWA Incident Report Form</td>
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<td>10</td>
<td>Fees and Services Schedule</td>
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<td>11</td>
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<td>12</td>
<td>HUD Rules Compliance 50059</td>
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<td>13</td>
<td>Unit Inspection Report</td>
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<td>House Rules</td>
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<td>15</td>
<td>Pet Rules</td>
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<td>16</td>
<td>Move-out Information Packet</td>
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<td>Tenant Handbook</td>
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<td>18</td>
<td>Lease Violation Notice</td>
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<td>Continuing Occupancy Agreement</td>
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<td>20</td>
<td>Work Order (sample)</td>
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<td>21</td>
<td>“EIV and You” pamphlet</td>
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<td>22</td>
<td>Affirmative Fair Housing Marketing Plan</td>
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<td>23</td>
<td>Emergency Contacts Supplement HUD-92006</td>
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<td>24</td>
<td>Race &amp; Ethnicity form HUD-27061-H</td>
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<tr>
<td>25</td>
<td>Information Needed from Applicant form</td>
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<tr>
<td>26</td>
<td>Citizenship Declaration</td>
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<td>27</td>
<td>Citizenship Verification</td>
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<tr>
<td>28</td>
<td>Consent to Disclose EIV Information form</td>
</tr>
</tbody>
</table>
Section One: Fair Housing and Equal Opportunity

Non-Discrimination and Appeal of Application Denial

Prospective Applicants will be determined eligible and screened based on HUD requirements and consistent standards. Incomplete Applications will not be processed and the required or disputed information must be resolved by the Applicant within fourteen (14) days of mailing the rejection notice. An appeal will only be considered if it is provided in writing by the Applicant within fourteen (14) days of PCH mailing of the denial. Any appeal will not be decided upon by the person who made the denial or reviewed the application but instead by a committee of the PCH Board. Persons with disabilities have the right to a reasonable accommodation to participate in this informal hearing. The final decision on eligibility is to be provided in writing within five (5) business days.

Fair Housing Laws

PCH promotes fair housing laws. Federal fair housing laws require that owners utilize policies and practices that do not overtly discriminate against persons with disabilities or that have the effect of discriminating against persons with disabilities. A neutral housing management policy is not discriminatory if it is essential to the housing project and modifying the policy would result in a fundamental alteration in the nature of the housing program or activity or create an undue financial burden upon the owner. Key federal civil rights and fair housing legislation consist of:

- Fair Housing Act of 1968
  - Prohibition of discrimination against specified protected classes
  - Reasonable accommodation requirements for persons with disabilities
  - Use of the Affirmative Fair Housing symbol on marketing information
  - Owners must display the Fair Housing Poster
- Title VI of the Civil Rights Act of 1964
  - Designation of additional protected classes
  - Owners must maintain racial and ethnic data
- Age Discrimination Act of 1975
  - Owners may not screen for age unless it is necessary to determine eligibility
- Section 504 of the Rehabilitation Act of 1973
  - The owner of a federally assisted housing program must make the property physically accessible and operated so that persons with disabilities may meet the tenancy requirements throughout the tenancy cycle.

Section 504 of the Rehabilitation Act of 1973 & Alleged Discrimination

Section 504 of the 1973 Rehabilitation Act was the first disability civil rights law to be enacted in the United States. It prohibits discrimination against people with disabilities in programs that receive federal financial assistance, and set the stage for enactment of the Americans with Disabilities Act. Section 504 works together with the ADA to protect children and adults with disabilities from exclusion, and unequal treatment in schools, jobs and the community. Within thirty (30) days of a resident or employee submitting a written grievances of alleged discrimination due to disability (24 CFR 8.53), the PCH Executive Director will provide a written decision in consultation with the PCH HR Committee.
Although not required to accommodate to a request that would result in an undue financial or administrative burden, PCH must make “maximum effort feasible” to provide an accommodation. This accommodation would include auxiliary aides provided by PCH as necessary to assist a disabled Applicant during the intake process.

A request for an accommodation to a disability may be made verbally or in writing. If the request is not on the PCH provided Reasonable Accommodation Request Form (Exhibit No. 1), it will be provided by PCH for completion by the resident. Within 30 days after satisfactorily completing and submitting the required form and the PCVH Executive Director (Sec. 504 Compliance Officer) will provide a written decision. Requests for an accommodation are for a Reasonable Modification or a Reasonable Accommodation.

**Reasonable Modifications Requests (Section 504)**

A person with a disability may request that the Property be modified physically due to the nature of their disability. If considered reasonable and applicable to current and any future tenants, these modifications (i.e. new grab bar in bathroom) will be provided at the property’s expense. If the request for a physical modification to the building will only specifically benefit that person (i.e. custom faucet) and does not adversely impact the Property, then the resident must pay for the installation and pay for the cost for restoration to the original building fixtures upon their vacancy from the property. If after analysis the request for the physical modification to the building (i.e. a new Jacuzzi with structural changes to building systems) is deemed to be unreasonable or cost prohibitive, the request for the modification will be denied. When a denial occurs, Management will remain open to a mutually agreeable alternative.

**Reasonable Accommodation Requests (Section 504)**

A request for a Reasonable Accommodation is a suggestion for changes in rules, policies and procedures, or for a physical modification to a unit or common area, necessary to enable a person with a disability equal access to and/or enjoyment of the housing program. PCH routinely seeks to identify and eliminate situations or procedures that create a barrier to equal housing opportunity for all and to generally improve resident safety. An unreasonable request would include costly structural changes, altering a load bearing wall, a fundamental alteration in programs or services, or access to mechanical rooms (including employees). When a denial occurs, Management will remain open to a mutually agreeable alternative.

**Independent Living & Information regarding Disabilities**

On the Application for housing (Exhibit 2), PCH only requests information on a person’s disabilities for purposes of determining program eligibility and for accommodation to ADA apartments. All leases necessitate independent living wherein the head of household is solely responsible the management of their household without any assistance from property management. Applicants and Tenants are therefore fully responsible for the management of their household and conduct of their hired aides, live-in aides, and guests in compliance with the lease.
Service Animals & Pets

This Property allows service animals (also referred to as assistance animals). These animals are not subject to the Pet Policy since a service animal is not a pet. A service animal is certified as specifically trained to do work or perform tasks for the direct benefit of an individual with a disability, including physical, sensory, psychiatric, intellectual, or other mental disability. Tasks performed can include pulling a wheelchair, retrieving dropped items, alerting a person to a sound, reminding a person to take medication, or pressing an elevator button.

Emotional support animals, also known as comfort animals and therapy animals are not service animals under Title II and Title III of the ADA. A statement from a medical professional stating that an animal would provide emotional support, comfort or therapy recognizes the potential value of a pet. PCH supports the use of pets if the Tenant can properly care for the animal as governed by the Pet Policy; i.e. size and license. A pet cannot be brought to the premises until first approved and pet deposit paid.

All assistance animals and pets at the property must be kept under proper control by the animal owner. If the animal causes financial and/or administrative burden to the property, or becomes a danger to the safety of others, the animal will be denied use of the premises.

Equal Access to Documents

PCH is responsible for keeping applicant and tenant records in a secure location and provide a confidential setting for review of required documents. An individual with disabilities is responsible for providing her/his own transportation to and from the location where PCH documents are kept. Residents may examine their Tenant file during regular business hours.

Mitigating Circumstances & Complaints

Section 504 and Fair Housing regulations state that consideration for mitigating circumstances shall be given to all persons applying for occupancy. If an applicant feels there is a mitigating circumstance or reasonable accommodation to be considered for determining occupancy, they should immediately contact PCH. Complaints alleging violations with regard to Fair Housing laws or suspected discrimination should be filed with the Department of Housing and Urban Development (HUD).

Section Two: Determination of Program Eligibility

Placement on Waiting List & Right to Appeal a Rejection

Applications are date and time stamped and placed on a waiting list according to when received. If the Applicant is determined eligible, screening takes place when the Applicant is near the top of the list. Pre-applications are not used for PRAC properties. If Application deficiencies cannot be resolved with the Applicant, the Application is rejected with notification by postal mail with explanation of the appeal process. For the appeal to be considered, the Applicant must submit a written request for appeal within seven (7) days of the mailed rejection. The appeal will be considered by a committee of the Board of PCH with a written decision provided within five (5) days.
Eligibility Factor No. 1 - Determine Compliance with Income Limits

HUD annually updates income limits for different household sizes. For PRAC properties, the household size may be one or two persons. For the Applicant/Tenant to be determined program eligible, PCH calculates the anticipated gross income for the next twelve (12) months based on the last six (6) months of all bank statements, all relevant documentation of anticipated income, and analysis of significant cash assets. If gross income is greater than the HUD limit, the Application is immediately rejected.

Current HUD income limits are available from PCH and on the internet at [www.huduser.gov](http://www.huduser.gov). Select: Data Set, designate Year, Query Tool, IL Documentation, State, County, and View County Calculations.

Eligibility Factor No. 2 – Establish Personal Identity, Disability Status, Age & Citizenship

For PRAC programs, Applicants must provide Birth Certificates and a second form of identification, preferably a picture ID to establish age. Only persons at least 62 years of age may be in a HUD Section 202 Elderly Only program household. If the head of household listed on the lease is deceased, the remaining household member automatically becomes the leaseholder on a new lease.

Only persons at least 18 years of age may be in a HUD Section 811 Disabled program as the head of household or additional household member. If the head of household is deceased and the remaining household member automatically becomes the leaseholder on a new lease.

Social Security numbers must be provided for all household members. All members claiming eligible immigration status and requesting assistance, regardless of age, must disclose and document their Social Security Number within 90 days of being offered an apartment by providing a Social Security card. A non-citizen may be admitted to a PRAC assisted property provided that legal Alien status is verified per HUD.

Approval for a live-in aide and foster children must go through the same identity review process as any household member with the understanding that a clear need for the aid must be established.

Eligibility Factor No. 3 – Ascertain the Need for an ADA Accessible Unit

The prospective Applicant must clearly document if they are in need of an apartment with ADA features. If the prospect documents the need for the ADA unit, they must also indicate if they desire the accommodation of moving into the next available unit, whether or not it is ADA functional. If the ADA qualified applicant moves into a non-ADA designated unit, they will automatically be placed on an apartment transfer waiting list for later relocation within the property.

Eligibility Factor No. 4 – Commitment to Program Requirements & Expectations

As part of the application process, the prospective Applicant certifies in the Application and its attachments to the following:
For properties supported by Project Rental Assistance Contracts (PRAC), the applicant/tenant agrees to abide with the HUD subsidy program rent calculation and certification procedures occurring at admission to housing and annually thereafter based upon HUD Handbook 4350.3.

Financial disclosure for PRAC includes signing the Asset Divestiture certification (Exhibit No. 3) at admission and annual rent re-certification to account for significant financial gifts, contributions and transactions for less than market value. Rent is based upon all income and certain assets minus eligible medical expenses, deduction for elderly/disabled allowance and a utility allowance deduction. The Total Tenant Payment (TTP) is the higher of:

- 30% of the monthly-adjusted income minus the utility allowance for the property
- 10% of the monthly gross income minus the utility allowance for the property
- If the Tenant does not follow PRAC requirements by the Tenant anniversary date, the Tenant may be evicted and rent becomes the higher of TTP of Project Contract Rent

Applicant agrees to utilize the unit as their only residence on a full-time basis. The Applicant cannot be approved if there is a financial debt to any federally assisted housing.

All Applicant/Tenant family members are subject to federal data base Enterprise Income Verification (EIV) and other documentation before a final determination of eligibility is made.

All adult Applicants at admission and any recertification must sign form HUD-9887 and form HUD-9887-A (Exhibit No. 4) giving consent to the release of information. Penalties for false information include eviction, loss of assistance, fines up to $10,000 and imprisonment.

Exclusive of live-in aides, a one bedroom apartment should be occupied by a household of no greater than two persons.

**Section Three: Determinations of Project Eligibility**

PCH provides affordable housing according to HUD project requirements for Section 202 Elderly Only and for Section 811 Disabled Only properties. An Applicant for housing applies separately for each HUD supported project. A unit transfer within a property can only considered by PCH after initial move-in.

**HUD Section 202 Eligibility**

PCH manages two HUD Section 202 Elderly Only projects. To be eligible for admission, all members of the household must be at least 62 years of age and not exceed HUD income limits.

**HUD Section 811 Eligibility**

PCH manages one HUD Section 811 Disabled Only project. For eligibility to an 811 project, all household members must have a have a mental, physical or emotional impairment (excluding a disability due to an alcohol or drug dependence) that:
• is expected to be of long, continued and indefinite duration;
• substantially impedes his or her ability to live independently; and
• such ability could be improved by more suitable housing conditions  OR
• Has a developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights  Act (42 U.S.C. 6001(5)).

For the Sec. 811 program, third party verification of disability will be conducted prior to Move-in. Acceptable forms of verifying disability include completion of the Disability Verification Form by a medical professional and the current receipt of Social Security Disability benefits. Those claiming eligibility because of disability do not have to be receiving disability benefits to qualify; however, in those circumstances, third party verification from a medical professional must be provided.

Assigning Units from Waiting List for Persons with Physical Disabilities

The PCH Application for housing requests documentation so it may be verified if a member of the household needs an accessible ADA unit due to their physical disability. If the need for an accessible ADA unit has been verified and the Applicant is on the waiting list, they are immediately reachable on the list for the next available unit that satisfies their ADA accessibility need. If no accessible unit is available when the family reaches the top of the waiting list and the applicant decides to accept a standard (non-ADA accessible) unit, s/he may request a reasonable accommodation to the standard unit or be placed on a Unit Transfer waiting list and wait for an ADA unit to become available.

Assigning Accessible Units within the Project

If an ADA unit becomes available, Management will first offer the unit to an individual with a physical handicap who is currently in the project residing in a standard unit who qualifies for ADA. If this is not possible, offering will be considered to ADA Applicants on the new move-in waiting list.

When neither a current resident nor qualified Applicant requires the features of an available accessible unit, Management will offer the unit to another resident or applicant, with a lease addendum. This addendum requires the resident to move to a non-accessible unit when one becomes available within 30 days of written notice with moving costs borne by PCH (Exhibit No. 5).

Policy & Procedure for Unit Transfers

Current residents may qualify for a unit transfer for one of the following conditions:
• Medical/health conditions, including inability to use stairs, or the need for a live-in aide;
• There is a need for a unit with special design features for a person with disabilities; or
• Other potential conditions reviewed on a case-by-case basis by Management.

To approve a transfer, the resident submits a Transfer Request form (Exhibit No. 6). The resident must be in good standing: timely rent payments, no unpaid damages, good housekeeping, no lease violations in effect, and agree to pay all transfer costs (unless a specific accommodation is authorized). If not in good standing, the request will be denied for at least 90 days before re-evaluation and the next Applicant on the transfer list will be considered.
A new move-in Applicant who qualifies for an ADA unit and accepts a standard apartment is automatically placed at the bottom of the In-House Transfer Waiting List. Any denial of an offered unit results in permanent removal from the list. The security deposit on the previous unit will be transferred to the new unit.

**Live-In Aide Definition & Policy**

A Live-In Aide is a person who resides with a Tenant who is elderly or has a disability and who;

- Is determined essential to the care and well-being of the person; and
- Is not obligated for the support of the person; and
- Would not be living in the unit except to provide the necessary supportive services.

Live-In Aides are treated as a Reasonable Accommodation. Live-In Aides will be screened for criminal history and in the national Sex Offender Registry. A relative (not spouse) may be a Live-In Aide and is not part of the household income and size calculation per the Live-in Aide Agreement (Exhibit No. 7).

**Eligibility of Students**

A household member may be a student provided the other applicable eligibility criteria i.e. age, person with disability household income are also met.

**Violence Against Women Act (VAWA) Protections**

HUD requires that all Tenants be made aware of the Violence Against Women and Justice Department Reauthorization Act of 2005 (VAWA). Accordingly, Tenants must sign form HUD-91067, Tenant Certification of notice of VAWA (Exhibit No. 8) at move-in (an Addendum to the Lease). The purpose of VAWA is to encourage Tenants to report acts of domestic violence, stalking, etc. to the police or on form-HUD-91066 (Exhibit No. 9) and submit to Management within 14 days of the incident without fear of retaliation from the landlord. VAWA records are to be kept separate from Tenant files.

**Charges for Facilities & Services**

A schedule of charges for damages to the apartment, cost for exclusive use of the community room for a private party, additional keys, etc. is posted in the lobby of the property (Exhibit No. 10). This schedule of Charges for Facilities and Services is provided to the Tenant at move-in and it is periodically updated with a new posting and 30 days of notice before implementation.

**Lease, Security Deposit, Pet Rules, House Rules and Notification of Changes**

Each PRAC property utilizes the same HUD Model Lease (Exhibit No. 11) and required attachments:

1. Owner’s Certification of Compliance with HUD’s Tenant Eligibility and Rent Procedures, form HUD 50059 (Exhibit No. 12)
2. Unit Inspection Report (Exhibit No. 13)
3. House Rules i.e. smoking and parking as applicable to the property (Exhibit No. 14)
4. Pet Rules (Exhibit No. 15)
The PRAC lease for the first twelve (12) months is a fixed term and thereafter is a month-to-month agreement with 30 days written notice before moving out. The Security Deposit is the Total Tenant Payment as calculated at move-in. With 30 day notice in advance of moving out, a move-out information packet (Exhibit No. 16) is provided. Damage charges are itemized in writing and sent by postal mail within 30 days of move out along with any remaining security deposit.

New rules, including changes in this Plan, go into effect 30 days after posting in the property lobby and two attempts to obtain the Tenant’s receipt of the rule change. Tenants who violate the Tenant Handbook (Exhibit No. 17) or interfere with peaceful enjoyment in a minor way receive a written warning. If the problematic behavior is repeated, the Tenant receives a notice of Lease Violation (Exhibit No. 18). A pattern of minor lease violations may be treated as a major lease violation. One major lease violation may be grounds for eviction. A Continuing Occupancy Agreement (Exhibit No. 19) may be utilized in an attempt to avoid eviction. If PCH terminates the lease with explanation for lease violation(s) and the Tenant does not move out within 30 days, legal eviction proceedings begin.

Owner Adopted Preferences from Waiting List

The Owner has not adopted any preferences for tenant selection associated with PRAC properties.

Unit inspections & work orders

PCH inspects apartments twice a year to make sure apartment components are in good condition and operating correctly. Tenants are to submit work orders by calling in or submitting on a form (Exhibit 20) whenever service appears necessary. If not at home when responding to a work order or performing an inspection, the maintenance employee performs the service and typically hangs a notice on the door handle.

By submitting a work order, tenants are giving permission for maintenance staff to enter their apartment to perform the requested work. The requested work will be responded to as soon as practical during normal business hours of 9 am – 4 pm Monday through Friday.

Routine or special inspections by Management occur with 48 hours written notice to the Tenant. Safety checks of the apartment occur without written notice when there are safety or security concerns for the property. PCH will not enter an apartment to check on the welfare of the occupant. Neighbors or relatives my call 911 if they are concerned for the welfare of the occupant.

Section Four: Screening for Applicant Suitability & Application Rejection

Purpose of Screening & Process of Denial

Eligibility criteria are used to determine if the Housing Prospect qualifies for participation with the HUD subsidy program and the legal requirements of the project in compliance with fair housing laws.
Screening criteria are used uniformly, consistent with fair housing laws, to determine if the Applicant (including police officers, security and management personnel in subsidized units) are likely to pay timely rent, abide by the lease, take care of the property and allow other residents to peacefully enjoy their homes. Applicants deemed unsuitable, will be rejected with the reason(s) provided in writing.

Circumstances to Prohibit Admission of the Applicant/Eviction of Tenant

A criminal background checks are performed at admission and at Annual Recertification. The Applicant is rejected or the existing Tenant evicted if any member of the household evidences the following:

1. Eviction from federally assisted housing for drug related criminal activity in the last five years.
2. Current illegal use of drugs for which the Owner has reasonable cause to believe the illegal use or pattern of use may interfere with the health, safety, and right to peaceful enjoyment of the property by other residents or illegal drug use in last five years.
3. Placement on a State lifetime sex offender registration or Methamphetamine lab activity is an immediate denial for the Applicant or eviction of the Tenant.
4. Reasonable cause to believe a household member’s behavior from abuse or pattern of abuse of alcohol may interfere with the health, safety, and right to peaceful enjoyment by other residents. This standard is based on behavior, not the condition of alcoholism or alcohol abuse.
5. Any history of violent criminal activity in last ten years.

6. Other criminal activity that may result in the applicant being rejected or the tenant being evicted:
   - Felony conviction within the last five years directly affecting persons
   - Felony conviction within the last three years affecting property
   - Two or more felony convictions in the past ten years
   - Two or more misdemeanor convictions in the last five years
   - Other criminal activity that may or does threaten the health, safety and peaceful enjoyment of premises including failure to disclose a criminal conviction

At the Owner’s sole discretion, a committee of the PCH board may:
- Consider evidence of rehabilitation that the evicted household member has been rehabilitated
- Determine that the circumstances to the eviction may no longer exist
- Require an Applicant to exclude a household member who prevents eligibility
- Consider evidence of drug or alcohol rehabilitation
- Reconsider a previously denied Applicant after three years from denial if certified and supporting documentation indicates the denied individual has not been engaged in violent criminal activity or other criminal activity (see above) by taking into consideration the seriousness of the offence, degree of participation of household members and the effect on the program’s integrity.

Screening Using the EIV Existing Tenant Search

Prospective Applicants are screened using the EIV data base shown in the HUD pamphlet “EIV and You” (Exhibit 21) to determine if the Applicant is receiving undisclosed federally subsidized rental assistance for another property; an immediate rejection.
Considerations in Developing Screening Criteria

An owner with a long property waiting list may establish relatively restrictive screening standards, whereas an owner with a short list may want less restrictive standards. For PRAC projects, Application and screening fees are not charged to the Applicant but may be charged to the project budget.

Screening Criteria

1. **Overview of Screening Criteria.** Owners are permitted to screen for suitability and may reject or deny an Applicant based on these criteria. Owners should consider developing screening criteria related to permitted criteria and may establish criteria that are not prohibited. All screening criteria adopted by the owner must be in the Tenant Selection Plan and consistently applied. The Applicant may voluntarily withdraw at any time during the Application process with explanation placed in the file and the Application retained with denied Applications for three years.

2. **Screening for Credit History.** The purpose of the credit history check is to determine the Applicant’s ability to meet financial obligations, personally manage their financial affairs, and demonstrated ability to make timely payments to creditors. Owners may reject for poor credit but not for lack of credit history. A credit rating system with scoring assists in standardizing the credit review process. Credit history should go back three to five or more years with emphasis on most recent history of demonstrated ability to manage household financial obligations. The Applicant must prove they can properly and consistently manage their own financial affairs.

Credit reports on all household members 18 and over will be used to examine Applicant’s ability to make good financial decisions for last five years regarding utilities payments, rent, mortgage payments, property taxes, outstanding loans, judgements, bankruptcies, foreclosures, etc. A low credit score due to medical costs may not cause rejection. Unpaid utilities will cause a rejection unless the Applicant can prove they were paid in full at time of Application. Outstanding balances of unpaid rent or damage charges at time of Application causes rejection. Outstanding legal judgements or bankruptcy are grounds for rejection unless due to catastrophic medical.

If the Applicant disputes the credit report and score and requests in writing the opportunity to address this, the Applicant has the sole responsibility for up to 120 days to have credit reporting agencies submit corrected information without change to the Applicant’s waiting list position.

3. **Minimum Income Requirement.** There is no minimum income requirement for PRAC properties.

4. **Screening for Rental History.** The Applicant is to provide contact information and consent for release of information from the last three landlords to show ability to comply with a lease. The lack of a landlord reference alone does not cause a rejection. The Applicant may be rejected if:
   - Late payments two or more times in the last two years
   - Evidence of interference with peaceful enjoyment/premises security or safety concerns including vandalism, drug activity, abuse or endangerment to others
   - Poor housekeeping or damage to property
- Allowing unauthorized visitors or excessive visitation to the unit or to live in the unit
- Evidence of apartment abandonment
- Creating physical hazards or otherwise violating the lease or house rules
- Eviction for just cause

5. **Screening for Housekeeping Habits.** Owners may screen for housekeeping according to reasonable standards within a defined geography on a consistent basis.

6. **Consideration of Extenuating Circumstances during Screening.** Owners must consider extenuating circumstances to help process an Applicant with a disability.

7. **Responsibility and Accountability for Managing Household.** The PCH lease necessitates independent living. The owner determines Applicant’s apparent ability to manage their own household in a responsible manner adhering to legal obligations, personal management of finances without a power of attorney and maintaining responsibilities to: bank, creditors, landlord, etc. Use of a representative payee is allowed as it promotes timely payment of financial obligations by a person with disabilities who recognizes the need for this support.

Reasons for rejection in this category may also include:
- Misrepresentation of information or hindrance with timely Application processing e.g. false information concerning need for reasonable accommodations or disabilities
- Inability or reluctance of the Applicant to accept the offered apartment, sign lease, pay rent and deposit(s), place utilities into their name at lease signing, and take full possession of the apartment as their sole place of residence within fourteen (14) days of notification of the apartment offering communicated by phone message and postal mail.
- Failure to satisfy HUD or PCH eligibility and processing requirements
- Evidence of fraud in the last three (3) years

8. **Cooperative Behavior.** The applicant must demonstrate appropriate household patterns and/or habits that would not interfere with the other resident’s rights to peaceful enjoyment.

9. **Cooperative Communication.** The applicant must be cooperative with providing required documentation and not interfere with management’s ability to perform application processing as the Landlord seeks to determine program and project eligibility.

10. **Forthright Statements.** The applicant must provide complete and consistent information to the best of their knowledge or else fraud will be suspected.

11. **Timely Response.** The applicant must adhere to stated Tenant Selection Plan time sensitive requirements for efficient processing and determination of eligibility.

12. **Prohibited Screening Criteria.** Owners may not create or utilize screening criteria that cause discrimination as defined by fair housing law require a medical exam or testing, or participation in a meals program. Owners may only require payments referred to in the lease.
An owner may not inquire if the Applicant or someone assisting the Applicant has a disability or the nature of the disability. An owner however must require supporting documentation when a person who claims a disability makes a request for a reasonable accommodation.

Rejecting Applicants and Denial of Rental Assistance

- **Key Requirements to reject or deny Applicants.** Owners must not violate fair housing laws. VAWA protections must be followed. Denial of admission or assistance must be in writing.

- **Conditions under Which Owners May Reject Applicants.** Owners may reject if the Applicant:
  1. Is ineligible for occupancy in a particular unit or property, and/or fails screening
  2. Is unable to disclose and provide required SSN verification
  4. Has household characteristics not appropriate to the type of unit available at that time, or has a family of a size not appropriate for the unit sizes that are available
  5. Includes family members with a citizenship conflict, and do not resolve it

- **Notification of Applicant Rejection.** A rejection notice must:
  1. Be in writing.
  2. Specifically state the reason(s) for the rejection notifying the Applicant that they have fourteen (14) days to respond in writing to the owner to request a meeting to resolve the dispute to the rejection.
  3. Explain that persons with disabilities have the right to request reasonable accommodations to participate in the informal hearing process.

- **Owner Meetings with Applicants to Discuss Rejection Notices.** Any meeting with the Applicant to discuss the Applicant’s rejection will be conducted with a committee of the PCH board. Within five (5) days of the owner response or meeting, the owner must advise the Applicant in writing of the final decision on eligibility.

Section Five: Marketing

**Key Requirements**

Marketing should attract a broad cross-section of the eligible population without regard to race, religion, sex, disability, familial status or national origin. When additional marketing of Applicants is needed to fill vacancies, an Affirmative Fair Housing Marketing Plan marketing is utilized (Exhibit 22).

**Affirmative Fair Housing Marketing Plan**

PCH must comply with its HUD approved Affirmative Fair Housing Marketing Plan which promotes equal housing choice to prospective Tenants regardless of race, color, religion, sex, disability, familial status, or national origin so that:

- Eligible families have similar housing opportunities
• Marketing strategies occur outside the immediate neighborhood
• Marketing efforts are monitored for effectiveness
• A local residency requirement will not be used without HUD approval

Special Marketing Requirements

For new construction and substantial rehabilitation not designed for disabled and elderly persons (except for previously HUD owned properties) owners must:
• Market to non-elderly families, including those with disabilities who are least likely to apply as identified in the Affirmative Fair Housing Marketing Plan; and
• Market to those expected to reside in the community due to current or planned employment

Advertising

During initial property lease-up, or when available units cannot be filled from waiting list (if any), owners must advertise to attract eligible in the market area least likely to apply. Advertising is to be directed to all Applicants regardless of race, color, religion, sex, disability, familial status, or national origin for:
• the life of the mortgage
• target groups not in the predominant ethnic or racial group of the neighborhood
• advertise with the HUD approved Equal Opportunity logo, slogan or statement
• outreach to the Limited English Proficiency Population

Records, Updating the Marketing Plan & Fair Housing Poster

During compliance review, owners must provide documentation that marketing activities have been consistent with fair housing requirements and include items such as media materials, records of activities any special activities conducted. Every five (5) years the Affirmative Fair Housing Marketing Plan must be reviewed or when the local Community Development jurisdiction’s Consolidated Plan is updated. When reviewing the Plan, if the outreach currently being performed does not accomplish marketing outcomes as measured by project occupancy, the Plan should be updated. The revised Plan must be submitted to HUD for approval. If the owner concludes that the Plan does not need revision, documentation of this review process must be available to HUD.

Owners must post and maintain the required Equal Housing Opportunity poster. It must be prominently displayed and readily apparent to all persons seeking housing.

Section Six: Waiting List Management

Key Requirements for Taking Applications

Anyone desiring housing admission must submit a completed Application. Blank applications are sent to Applicants upon request and accommodations are made in this process for persons with disabilities. The
submitted Application must be signed and dated certifying to the accuracy and completeness of the confidential information with the attached form HUD-92006, Supplement to Application for Federally Assisted Housing (Exhibit 23). This HUD form provides opportunity for the Applicant to provide optional contact information during admission and is updated at annual recertification during tenancy.

The Applicant must also attach a self-certification of their race and ethnicity for data collection using HUD form HUD-27061-H (Exhibit 24). Completing this form is optional without penalty.

Contents of Housing Application & Types of Applications

The written Application includes the following data:

1. Household characteristics including name, age, disability status to indicate need for ADA unit
2. Household contact information
3. Identification of project preferences (if any)
4. Source(s) and estimate(s) of household’s anticipated annual income and assets
5. Citizenship declaration
6. Marketing information to understand how the Applicant heard of the property
7. Screening information including prior landlords, history of home ownership, reasons for incarceration, reasons for eviction, conflicts with neighbors, ability to manage household finances and use of credit, and criminal activity past and present
8. Residency chronology for all states lived in and for the last five years and the periods of rental occupancy, assisted living, homelessness, incarnation and home ownership
9. Application certification that all information is true to best of knowledge and a general release to obtain all information related to property manager/owner consideration of the Application

The Application for housing must also request the following information from Applicants:

1. Whether any household member is subject to State lifetime sex offender registration in any state
2. List of all states where Applicant and members of household have resided
3. Disclosure of SSNs for Applicant and all household members, except those who do not contend eligible immigration status
4. Whether the Applicant was 62 or older as of January 31, 2010, and who does not have a SSN, if they were receiving HUD rental assistance at another location non January 31, 2010
5. Form HUD-92006, Supplemental and Optional Contact Information

PCH utilizes only a “full” Application for PRAC properties; not a pre-application form.

Supplement to Application for Federally Assisted Housing (HUD-92006) & Retention Period

Applicants may provide supplemental information as to an individual or organization that may be contacted to assist in providing any delivery of services or special care to Applicants to assist in resolving any issues at time of application or during tenancy as follows:

1. At time of Application:
   a. Owners must give the Applicant opportunity to form HUD-92006. This form enables the Applicant to identify contacts and the reason(s) to contact these persons or organizations
b. Applicants, who choose not to provide contact information should check the box indicating this, sign and date the form.
c. Owners should provide Applicants opportunity to update contact information
d. Form HUD-92006 is completed for each individual or organization for contact and the reason(s) for contact.

2. After admission:
   a. Owners should provide form HUD-92006 for Tenant’s use at annual recertification
   b. Owners cannot require Tenants to utilize this form
   c. Tenants may update this form at any time
   d. Owners should provide opportunity to update this form

Owners will contact individuals or organizations indicated on the form only for the uses stated to assist in resolving Tenant issues, the delivery of services and for special care. If the Applicant does not become a Tenant, this confidential form will be retained for three years. If the Applicant becomes a Tenant, the owner will retain this confidential form with the Application for the term of tenancy plus three years.

**Overview to Matching Move-in Waiting List Applicants for Available Units**

After unit size and preference order on waiting list are determined, owners select Applicants in chronological order to fill vacancies. After eligibility and screening has occurred, income targeting requirements are applied to determine if the Applicant can be housed. During this process, owners are not to discriminate when matching households unless restricted by program statute (i.e. age).

In selecting a family to occupy a particular unit type, the owner must match family size and number of bedrooms to comply with occupancy standards and local codes. Owners must offer units with special accessibility features to persons with disabilities requiring such features.

When income targeting or preference requirements are required, a notation is made on the waiting list when an Applicant is passed over. The owner will then look for the top ranked Applicant that satisfies the various requirements according to appropriate bedroom size and preferences.

Single persons are eligible families however they may not be placed on the two bedroom waiting list or occupy a unit with two or more bedrooms except for a person who needs a reasonable accommodation or an elderly person who has a verifiable need for a larger unit. A displaced person may be placed on a two-bedroom or larger unit if no one-bedroom units are available subject to preference rules.

**Key Requirements to Creating and Maintaining Waiting Lists**

When an Application is received, it is recorded by date and time and placed on the waiting list unless a preliminary eligibility review prompts immediate Application rejection i.e. someone less than 62 years of age requesting admission to a Sec. 202 Elderly Only PRAC project. Preference for which the Applicant qualifies for are noted. The owner must also provide notice of a closed waiting list.

**Opening & Closing of Property Waiting List**

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If the Waiting List becomes excessive, the owner will consider closing the waiting list to a property if the wait is in excess of two (2) years. When the list is closed it is announced on the PCH website and housing prospects are notified that Applications will not be accepted. This notice will state the reasons for the owner’s refusal to accept additional applications.

When the Owner agrees to accept Applications again, this will be explained on the PCH website and in media outlets expected to be read by prospective applicants. This notification will be extensive including rules for applying and the order in which Applications are processed. Advertising of the waiting list re-opening will also conform to marketing and outreach activities described in the Affirmative Fair Housing Marketing Plan appropriate to the property.

**Determining an Applicant’s Preliminary Eligibility**

Preliminary review eligibility thresholds:
- Before placing on waiting list, check for obvious ineligibility and notify Applicant accordingly.
- Place Applicant on waiting list for appropriate sized/type of unit unless the Application needs clarification to accomplish this and notify the Applicant accordingly.
- If preliminary screening discloses SSN conflicts, this must be resolved before admission.
- If an Applicant is otherwise eligible but not appropriate size unit exists in the property, the owner may reject the Application.

**Creating Waiting Lists**

To assure appropriate and fair selection, PCH will:
1. The waiting list will be recorded in written electronic format with periodic note updates
2. The list will be kept as up-to-date as possible and periodically subject to staff error checking
3. Waiting list data collected and recorded will include:
   a. Date and time the Applicant submitted the Application
   b. Name of head of household
   c. Annual income level
   d. Identification of need for accessible unit, including need for accessible features
   e. Preference status
   f. Unit size

Although data in addition to the above may be collected in the application process, it is good practice to avoid using Inclusion as it is not directly relevant to tenant selection. The same Applicant may be on multiple waiting lists.

**Placing Families with Disabled Family Members**

Provisions to accommodate to disabled family members include:

A. The owner must not skip over a family that has reached the top of the list needing accommodation because of disability. A family needing an accessible unit is immediately reachable on the move-in waiting list when a unit with the needed ADA accommodation
becomes available, providing all eligibility and screening approvals have been accomplished.

B. The family will be given opportunity to move into a standard unit whenever any unit becomes available in compliance with Section 504 thereby being notified regardless of unit accessibility needs. At the Applicant’s request, they may be placed on the property transfer waiting list to wait until an accessible unit becomes available.

C. If the family accepts the standard unit, they may request a reasonable modification of accommodation of the standard unit and at their discretion.

D. Families who have a member who needs the accessibility feature of the unit take priority to occupy accessible units over families with no disabled family members.

**Documenting Changes to Waiting Lists**

Any waiting list action taken or Applicant specific activity must be recorded on the waiting list including:

- Brief auditable records are needed to show additions, withdrawals, selections and rejections.
- Standardized method to maintain documentation for ease of auditing.
- Manual records to be made a permanent record,
- Electronic records must maintain date and time of entry of new Applicants with the record printed and stored in the Tenant file or a central file. Applicant status changes should be recorded and the list re-sorted and printed. Authorization safeguards and system user identification should also be utilized.

**Updating Waiting List Information**

The waiting list should be updated annually or semi-annually to ensure that Applicant information is current; including name, contact information, and household composition changes that may impact the associated occupancy apartment size eligibility.

**Removing Names and Reinstating Applicants to the Waiting List**

Applicant removal occurs as guided by the following policies:

1. The removal is documented as to why the Applicant failed eligibility and/or screening.
2. The Applicant has fourteen days to respond to written notice for an eligibility interview.
3. For the Applicant at the top of the list, the Applicant is rejected and removed from the move-in list or transfer list if an offer of the next available apartment is declined.
4. The Applicant who fails to provide SSNs in satisfaction to HUD requirements for HUD assisted units is denied.
5. Mail sent to the Applicant’s address is returned as undeliverable.
6. The unit size needed has changed based on family size and no appropriate sized unit exists in the property.
7. Periodically the electronic waiting list is printed to preserve how the waiting list appeared after removal of each name.
8. If an Applicant is incorrectly removed from the waiting list by PCH, the Applicant will be
reinstated to the original place on the waiting list.

**Record-Keeping**

Record-keeping components include:

- Applicant files remain current as long as their status on the waiting list is active.
- After removal from list, owner retains the Applicant completed HUD-92006 with reason for denial and supporting documentation for three years.
- When Applicant moves in, form HUD-92006 remains with the Tenant file and for three years after the tenant leaves the property.
- All files are kept secure and confidential.
- The Applicant’s or Tenant’s file should be available upon request for their review or by a signed/authorized third party. EIV has additional disclosure requirements.
- Applicant and Tenant files are disposed of in a manner to prevent unauthorized access to information.
- Records must be kept and reports submitted to enable HUD to ascertain regulation compliance.

**Section Seven: Selecting Tenants from the Waiting List**

**Overview**

The waiting list determines the order for selecting Tenants based consistent application of standards, HUD requirements and fair housing laws. When a unit becomes vacant, selection of the next Applicant is based on unit size available, preferences established for the property, income targeting, and verification of SSNs and screening policy of the owner. The owner selects the first name on the list appropriate to unit size and Section 504 as applicable with final determination of eligibility and screening according to established procedure and policy.

**Applicant Interviews**

The owner will request an interview in writing and list the document items the Applicant must bring (Exhibit 25). At the interview the owner must:

1. Confirm and update all information provided by the Applicant.
2. Explain program requirements including EIV and penalties for false information.
3. Obtain family income and composition information.
4. Review financial information and ask what types of income and assets are received and document if the Applicant appears to have a source of income/asset not being reported.
5. Obtain from all family members 18 and over signatures on Forms HUD 9887 and 9887-A and any other necessary verification requests.
6. Obtain declaration of citizenship (Exhibit 26) and verification of consent (Exhibit 27) for verification of all household members as appropriate.
7. Inform the Tenant that EIV existing Tenant Search will be used to determine if any family member is receiving HUD rental assistance at another location and obtain signed consent for each landlord reference check to be sent.
Applicant Interviews (continued)

8. Obtain Asset Divestiture Certification signatures from the head of household, co-head and spouse to calculate any assets disposed of for less than fair market value.
9. Require disclosure of verified SSNs for all household members per HUD regulations.
10. Advise family that HUD will examine income data bases on the family.
11. Inform Applicant that a final eligibility decision will occur when verifications are complete.
12. Provide Applicant with the HUD fact sheet on how rent is calculated.
13. Provide Applicant with the HUD “EIV and You” & Resident Rights and Responsibilities” brochure.
14. Inform family re fair housing laws, reasonable accommodation policies, provision of auxiliary aids, making units and facilities accessible, and permitting the use of assistance animals.
15. Explain pet rules to PRAC project Applicants.

Income Targeting

Income Targeting requirements do not apply to PRAC properties or projects within the Affordability Period of HOME program assistance.

Verification of Waiting List Preferences

Preferences applicable to the property must be verified any time before offering a unit:
1. Verification of displacement. Documentation supporting government displacement or presidially declared disaster.
2. Military status. Document the head, spouse, or co-head.
3. Verify income. Applies to Section 236 projects.
4. Verify other preferences:
   a. State and local preferences. For example, documentation from VA.
   c. Working families. Documentation of employment.
   d. Disability. Confirm existence of the disability. Verification provided by medical professional or Social Security Disability payments or award letter.
   e. Age. Confirm at least 62 years of age with birth certificate, social security or military documents.

Implementing Screening Reviews

Screening typically occurs immediately after full eligibility review when the Applicant is expected to be reachable for the next available unit in the near future. The screening process is used to determine if the Applicant is likely to honor an independent lease living arrangement in compliance with PCH rules. Evidence is therefore examined regarding Applicant taking responsibility for their legal and financial obligations, and accountability for making good decisions to manage their household without disruptive behavior or conflicts with neighbors and legal authorities. Screening rules and guidelines are:
- **Credit History.** Owners may reject for poor history but not for no history. For each of the last three landlords, the Applicant should have signed the landlord release during the initial Applicant interview and the references should indicate if rent was paid on time. The credit report is reviewed to account for medical obligations and other information provided by Applicant to determine how they are in control of and manages their money.

- **Rental History.** Examine landlord references and any supplementary information from the Tenant knowing information from landlords, especially the most recent may be suspect. Determine if there is apparent compliance with the lease and/or conflicts with neighbors.

- **Housekeeping.** The quality of housekeeping is only examined if all prospects in a specific geographic are visited.

- **Drugs and Other Criminal Activity.** All adult members of the household must sign a consent allowing relevant criminal information to be released to PCH to determine if they are or were engaging in criminal activity per criminal background checks and as supplemented on information provided by the Applicant. Exceeding of standards causes Application denial.

**Screening Procedures**

Screening procedures must be applied consistently to all Applicants assisted by the following guidelines:

1. Use **consistent staffing** to reduce likelihood of errors.
2. Use step by step written instructions (this Tenant Selection & Occupancy Plan is written as a general reference for Applicants and Tenants and as a staff training manual).
3. Use **standard forms** (refer to the Exhibits in this Plan).
4. The uses of **objective criteria** are stressed in this Plan. Avoid subjective questions of Applicants.
5. Follow a formal **written process** for collecting information.
6. Consider if the Applicant has a **possible disability** that would hinder their processing and attempt to consider an accommodation.
7. **Verify the need for the accessible unit** to make sure the features of the unit address the need for the accommodation and they are qualified to receive priority consideration on the waiting list.
8. **Be ready to consider a request for assistance** as request for a reasonable accommodation as explained in this Plan. If for example, at any time during application processing or certification of rent after tenancy, the Applicant/Tenant may request and authorize someone to assist in reviewing EIV data by completing an EIV Information Disclosure form (**Exhibit 28**).
9. Follow HUD requirements regarding citizenship and verify SSNs as required by HUD early in the tenant selection process in case a denial and associated appeal becomes necessary without holding up the overall tenant selection process.