605 WILLOW ROAD, MENLO PARK, CA 94025
PHONE (650) 561-6283 TDD (800) 735-2929
WH-MANAGEMENT@EAHHOUSING.ORG

RESIDENT SELECTION PLAN

Willow Housing is a **60**-unit affordable residential community in Menlo Park, Ca, with a priority for housing veterans of the United States Military who are homeless or at imminent risk of homelessness. Willow Housing provides housing for very low and extremely low income individuals and families, without regard to race, color, sex, creed, religion, national origin, physical or mental disability status, familial status, age, ancestry, marital status, source of income, sexual orientation or any other arbitrary personal characteristics.

Thirty-five (35) of Willow Housing's units are set-aside for homeless U.S. Veterans enrolled in the HUD VASH (HUD-Veterans Affairs Supportive Housing) Program, where residents pay a percentage of their income towards the monthly rent. The remaining **Twenty-four (24)** Non-Project-Based-VASH ("Non-PB-VASH") units are set-aside for (but not restricted to) homeless U.S. Veterans and U.S. Veterans at imminent risk of becoming homeless.

No changes to this Resident Selection Plan or the processes described herein shall occur without the prior written approval of the Office of Asset Enterprise Management (OAEM) designated VA representative.

NON-SMOKING POLICY

Smoking is permitted in designated outdoor smoking common areas only. Smoking is not permitted in individual units nor any indoor area.

Willow Housing does not provide or guarantee a smoke-free environment but shall take reasonable steps to enforce this policy. Residents are responsible for the conduct of their guests and invitees while they are on the Property. Repeated violation of this policy may result in the termination of the Lease/Rental Agreement.

REASONABLE ACCOMMODATION

Willow Housing is an Equal Opportunity Housing Facility, admitting applicants in accordance with local, state and federal Fair Housing laws, HUD-VASH Program Regulations, the Affirmative Fair Housing Marketing Plan (AFHMP) and in accordance with applicable program regulations of the State of California Tax Credit Allocation Committee, the State of California Debt Limit Allocation Committee, HomeFirst, the County of San Mateo and the City of Menlo Park.

Management staff operates and administers the property to enable persons with disabilities to have equal access to participate in the program. Willow Housing will ensure effective communications with applicants, residents, and the public to ensure that policies regarding how the property is operated do not adversely affect applicants, residents and the public.

When a family member requires an accessible feature(s), policy modification, or other reasonable accommodation to accommodate a disability, Willow Housing will provide and pay for the requested accommodation unless doing so would result in a fundamental alteration in the nature of the program or an undue financial and administrative burden.

A reasonable accommodation is a change, exception, or adjustment to a program, service, building or dwelling unit that will allow a qualified person with a disability to:

1. Participate fully in a program;
2. Take advantage of a service; or
3. Live in a dwelling.

To show that a requested accommodation may be necessary, there must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability.

The requirement to provide a reasonable accommodation is present at all times throughout the tenancy of a person with disabilities, including during lease enforcement. Reasonable Accommodation Request forms are available upon request from management but are not required in order to make a reasonable accommodation request.

The person named below has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Housing and Urban Development's regulations implementing Section 504 (24 CFR, part 8 dated June 2, 1988).

Catina Wilson, Compliance Director
22 Pelican Way, San Rafael, CA 94901
Telephone 415-258-1800 ext. 8839
TDD 800-735-2929

INCOME LIMITS

To qualify for a unit, the household's gross income may not exceed the maximum income limit per household size and may not be lower than the income minimum* per household size.

The income limits are designed to be consistent with the requirements of the financing programs and regulatory agreements governing the property, which for Willow Housing include the California Tax Credit Allocation Committee, Veterans Affairs Supportive Housing, the California Debt Limit Allocation Committee tax-exempt bond program, the County of San Mateo HOME program, Affordable Housing Program (AHP), and the City of Menlo Park loan program.

The income maximums and minimums are attached and will be posted in the Willow Housing Office.

**If annual household income does not meet or exceed the minimum level shown for appropriate household and apartment size, but is not more than 10 percent (10%) less than the minimum, the apartment may be rented if proof is obtained indicating satisfactory and timely rental payment history for the past twelve (12) months in the amount equal to or greater than the rent charged for that unit size.*

**Applicants that fail to meet the income minimum may use a co-signer to meet this requirement. In the event that a co-signer is used to meet the income minimum, the co-signer will need to meet the following requirements:*

- *A co-signer application must be completed*
- *A non-refundable credit report processing fee of $25.00 will be charged.*
- *Income must be no less than three times the amount of their own rent/mortgage.*
- *Assume all responsibility for any damage in the unit caused by the occupants and their guests.*

Minimum Income limits or Resident Rent may not apply to participants in subsidy programs such as VASH, Section 8, Shelter Plus Care, SSVF and other subsidized rental assistance programs.

Notwithstanding anything to the contrary contained in this Resident Selection Plan or the Extended Use Lease (the "Lease") to which this Resident Selection Plan is attached as an exhibit, with respect to the thirty-five (35) units set-aside for eligible homeless United States veterans that will receive project-based

vouchers through the HUD VASH program, if all or any portion of the HUD VASH subsidy projected to be available to such units is terminated, not renewed, or otherwise becomes unavailable to the Project and provided that (i) the termination, non-renewal, or unavailability of such subsidy is not attributable to the actions or inactions of Lessee, (ii) Lessee after having used its best efforts to obtain alternative funding has been unable to obtain alternative funding, and (iii) the Project otherwise is in compliance with the requirements of the Lease; then, Lessee may, subject to Lessee's prior consultation with and written approval from VA, Lessee may lease such units to tenants other than eligible homeless U.S. veterans, provided such tenants have an income not to exceed 60% AMI, but only to the minimum extent required for the financial feasibility of the Project and approved in writing by VA, such written approval not to be unreasonably withheld, conditioned, or delayed. In connection with the foregoing, Lessee must provide VA on an ongoing basis, documentation of Lessee's continued efforts to replace the HUD VASH subsidy with other forms of funding to reinstate the income limits and tenant eligibility criteria described herein, including but not limited to alternative federal and/or state subsidies and private funding.

Notwithstanding anything to the contrary contained in this Resident Selection Plan or the Lease, with respect to the twenty-four (24) non-PB-VASH units, at such time as the restrictions associated with the Tax Credit financing of the Project (30 years from the date hereof) and the City and County Loans to the Project (55 years from the date hereof) are no longer in effect, the Lessee may lease such units in the Project to tenants other than eligible homeless U.S. veterans, provided such tenants have an income not to exceed 60% AMI.

APPLICATION PROCEDURES

Applications are available online when the Waiting List is open.

Each applicant must complete an application and be willing to submit to a credit history, rental history, and criminal background inquiry, as well as income and asset verifications. **Willow Housing is available to assist any applicant household with completing applications.**

The application must be completed and signed by the head of household and all household members 18 years of age and older before an applicant can be placed on the waiting list. If an application is not completely answered, the date of it being fully completed will be the date that the application is considered accepted for rental purposes.

Applicant interviews will be held to obtain signed verification forms for all income, asset, and rental history information. All applicants will be required to comply and cooperate with third party verification requirements. It is the applicant's responsibility to provide the information that will enable management to complete and receive the necessary verification in a reasonable time. This will include but not limited to, bringing three months most current consecutive payroll stubs, six months of most recent consecutive checking account bank statements, most recent bank statements for all other asset accounts and current Social Security and Pension Award letters.

WAITING LIST

All new applicants that return a completed and signed application will be added to the existing waiting list first in preference order then in the order they are received. **Applications must be received by the published application due date**. Applications received after the due date will not be accepted unless a valid reasonable accommodation request is received. Each applicant's application must indicate the size of unit/number of bedrooms required. A preliminary calculation of income will be performed to determine the households Area Median Income (AMI) qualification status. Those households not currently meeting the AMI criteria during the preliminary

review will maintain their place on the Waiting List.

Willow Housing will have **one** waiting list. The Waiting List will include preference codes for the non-PB-VASH units: 1) very low income homeless U.S. veterans and U.S. veterans at risk of becoming homeless, and 2) applicants that meet the local preference criteria.

Households will be selected in chronological order as assigned during the initial lease-up. When the Waiting List is reopened, all applications received will be added to the existing waiting list and selected in preference order then in the order they are received for **each designated unit type**. Applicant households at the top of the Waitlist for each designated unit type will be interviewed to determine eligibility. Households that do not meet the eligibility requirement of the Resident Selection Plan will receive a letter of denial for housing. Applicants that receive a denial letter have the right to appeal the decision. All other applicants will remain on the list until a unit is available and the household reaches the top of the list. For exceptions to this, please also refer to section regarding periodic Purging the Waitlist.

PREFERENCES

Every applicant must meet the Property's Resident Selection Plan standards for acceptance as a resident ***(see Grievance/Appeal Process section of this plan)***.

For units designed as accessible for persons with mobility, visual or hearing impairments, households containing at least one person with such impairment will have first priority for those units.

PREFERENCE FOR VASH ELIGIBLE HOUSEHOLDS REFERRED BY THE VA PALO ALTO HEALTH CARE SYSTEM HUD-VASH PROGRAM

Thirty-five (35) units will be set-aside (restricted) for eligible **homeless United States Veterans** referred by VA Palo Alto Health Care System's HUD-VASH Program. Residents who are approved for a restricted unit will receive HUD-VASH project-based assistance and will pay a percentage of their adjusted income towards rent as calculated by the Housing Authority of the County of San Mateo (PHA).

In addition to meeting the requirements of this Resident Selection Plan, applicants for restricted units will also need to meet the requirements set forth for the HUD-VASH Program. A separate screening process will be conducted by VA Palo Alto Health Care System's HUD-VASH Program and PHA to determine each applicant's eligibility.

HUD-VASH Processing STEPS:

Unit Openings – Once a HUD-VASH unit becomes available, EAH will notify Palo Alto Health Care System's HUD-VASH Program and PHA of the vacancy. The VA HUD-VASH Program and PHA will work jointly screen, approve, and refer candidates based upon HUD-VASH program eligibility criteria and established program processes.

Referrals to Willow Housing – The Property Manager will contact households referred by the VA HUD-VASH Program and PHA to schedule an interview and determine property eligibility.

Approved Applicants – Applicant's determined eligible by the Property Manager based upon the Resident selection Plan will be offered a unit and subsequently scheduled a move in date. The Property Manager will prepare a move-in letter advising the applicant of the date and time of the move-in orientation and lease signing appointment.

Housing Quality Standards (HQS) Inspection – Once the unit is available for occupancy and applicant approved, PHA will

conduct a unit inspection to ensure the unit meet Housing Quality Standards.

Move-in –PHA and Willow Housing will coordinate initial inspection and signing of Housing Authority Payment Contract (HAP). The approved applicant will attend a move-in orientation, sign the lease documents, sign the Housing Authority contract and Tenant Income Certification (TIC), and perform a unit inspection with the Property Manager. The Property Manager will then provide the applicant with keys to the unit.

HEARTH DEFINITION OF "HOMELESS"

Homeless. The HUD-VASH Program follows the definition of "homeless" as authorized in 38 U.S.C. 2002(1) and The McKinney-Vento Homeless Assistance Act, as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. ***NOTE:*** *See* *http://www.hudhre.info/hearth/*. Homeless refers to:

1) An individual or family who lacks a fixed, regular, and adequate nighttime residence.
2) An individual or family with a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.
3) An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, state, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing).
4) An individual who resided in a shelter or a place not meant for human habitation and who is exiting an institution where the individual temporarily resided.
5) An individual or family who:
    a) Will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, state, or local government programs for low-income individuals or by charitable organizations, as evidenced by:
        1. A court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days.
        2. The individual or family having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days. 3. Credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible must be considered credible evidence for purposes of this clause.

    b) Has no subsequent residence identified.
    c) Lacks the resources or support networks needed to obtain other permanent housing.
6) Unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who:
    a) Have experienced a long-term period without living independently in permanent housing;
    b) Have experienced persistent instability as measured by frequent moves over such period;

and

c) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, SUD, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or multiple barriers to employment.

NOTE: *The term "homeless" or "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of Congress or a state law.*

Chronically Homeless. The HUD-VASH Program follows the Federal definition of the term "chronically homeless" from the HEARTH Act, which states, with respect to an individual or family, that the individual or family:

1) Is homeless and lives or resides in a place not meant for human habitation, a safe haven, or in an emergency shelter;
2) Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 1 year or on at least four separate occasions in the last 3 years;
3) Has an adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable SUD, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability, including the co-occurrence of two or more of those conditions; and
4) A person who currently lives or resides in an institutional care facility, including a jail, SUD or mental health treatment facility, hospital, or other similar facility, and has resided there for fewer than 90 days must be considered chronically homeless if such person met all of the requirements described in subparagraph 4e prior to entering that facility.

The remaining **twenty-four (24) non-PB-VASH** units will be targeted (not restricted) for homeless U.S. veterans and U.S. veterans at imminent risk of becoming homeless. Very low and extremely low income U.S. Veterans will have priority over non-Veteran homeless individuals.

VERIFICATION OF HOMELESSNESS

For HUD-VASH program participants, the VA has the sole responsibility in determining and verifying the U.S. Veteran's homeless status.

For non-PB-VASH units, the following are examples of documentation verifying a household's homeless or at-risk of homelessness status:

Persons coming from an **emergency shelter** for homeless persons: Written verification from emergency shelter staff that the applicant has been residing at the emergency shelter for homeless persons. The verification may be the HMIS record of shelter stay, HomeFirst Homelessness Certification form or a signed letter on letterhead from an emergency shelter provider, service provider or clinician.

Persons coming from a **place not meant for human habitation**: Written verification from the HMIS record of homeless street outreach contacts, HomeFirst Homelessness Certification form or a signed letter on letterhead from a homeless street outreach provider or referral source.

Persons discharged from a **hospital or other institution** (if the client's stay was 90 days or less and was in emergency shelter or place not meant for human habitation prior to admission): Written letter from hospital or other institution AND at least one

of the following related to the client's housing status immediately prior to the stay in the institution:
HMIS record of shelter stay or homeless street outreach contacts, HomeFirst Homelessness Certification form or signed letter on letterhead from an emergency shelter provider, homeless street outreach provider, or referral source.

Persons coming from **transitional housing** for homeless persons (if graduating from or timing out of Transitional Housing, and was in emergency shelter or place not meant for human habitation prior to admission): HomeFirst Homelessness Certification form or signed letter on letterhead from a transitional housing provider stating residency and homeless living situation prior to admission.

Fleeing **domestic violence**: HomeFirst Self-Declaration of Homelessness form AND brief, written explanation for using self-declaration by staff obtaining oral statement or where the safety of the household is not in jeopardy, written referral on letterhead by a service provider from whom the household has sought Domestic Violence assistance.

Persons **imminently losing primary nighttime residence** (individual or family is being evicted with 14 days from their primary nighttime residence and no subsequent residence has been identified, and the household lacks the resources or support networks needed to obtain other permanent housing).

At least one of the following must be obtained: 1) Court order resulting from an eviction notice or equivalent, or a formal notice; 2) For individuals in hotels/motels, evidence that the individual or family lacks the financial resources necessary to stay for more than 14 days; 3) Oral statement by the individual or head of household that the owner or renter of the residence will not allow them to stay for more than 14 days and documentation by staff of the statement the client made to staff **and**: a) written verification from the owner or renter of the residence verifying the client's statement or documentation of due diligence by staff in attempting to obtain such statement. In addition to one of the following listed above, corroborating HomeFirst Self-Declaration of Homelessness form.

Persons with **persistent housing instability**: HomeFirst Persistent Housing Instability Certification form and signed letter on letterhead from a nonprofit, state, or local government entity that administers another federal statute stating that the individual or household qualifies as homeless under that statute's definition.

VERIFICATION OF U.S. VETERAN STATUS

For HUD-VASH program participants, the VA has the sole responsibility in determining and verifying U.S. veteran status.

For non-HUD-VASH units, a copy of the applicant's DD214 or letter of service will be required to verify US Veteran status.

MENLO PARK "LOCAL" RESIDENT AND WORKER PREFERENCE

Additionally, **eleven (11)** of the 24 non-PB-VASH units, will have local preference for individuals who already live or work in Menlo Park for at least twelve (12) months prior to application. To the extent that there are not enough homeless/at risk U.S. veterans who meet the Menlo Park local preference, these 11 units will be targeted towards U.S. veterans who have been Menlo Park locals for at least six (6) months prior to application, then to Menlo Park locals of at least twelve (12) months who are not U.S. veterans, and then to U.S. veterans who are not Menlo Park locals.

If eleven (11) units are occupied by Menlo Park locals of at least twelve (12) months, then the Menlo Park Local points shall not be applied.

Subject to availability of the eleven units, preference for those

on the Waiting List will be given to applicants with verifiable local residency or employment to include those who live, are working or who have been notified that they are hired to work in Menlo Park ("City").

Verifiable Local Residency Preference: Applicant must provide any of HomeFirst required documents listed above or one of the items listed below to verify Menlo Park local preference:

•Lease agreement verifying residency;
• Copies of utility bills (electric, water, or gas);
• Federal tax return; or
• Driver's license or California ID
• Letters from HVRP or other VA staff

Verifiable Local Employment Preference: (if applicable) Applicant must provide any one of the following:
• A letter from an employer stating the past or anticipated starting date of employment, the position title and whether the position is full-time, part-time, temporary, contract or other, and the number of hours or expected hours of employment; or
• Copies of check stubs.
• If employment is a contract position; provide a copy of the employment contract.

After all of these restrictions and preferences, units can ultimately be assigned to any TCAC qualified households.

Preference Points

Applications will be ranked in chronological order as assigned during the initial lease-up. When the Waiting List is reopened, all applications received will be added to the existing waiting list first in preference order then in the order they are received. Preferences determine the ranking by which applicants are selected but will not affect an applicant's eligibility. Preference order will be determined based on the following point system:

- United States Veteran 7 points
- Homeless 3 points
- At Risk of Homelessness 2 points
- Local (Choose only one):
    - Menlo Park Local (12mo) 3 points*
    - Menlo Park Local (6-12 mo) 2 points*
    - San Mateo County Local 1 point*

* Applied only if "Menlo Park Local" units are available (11 total).

ADMINISTRATION OF WAITING LIST AFTER INITIAL LEASE UP

The property is required to maintain a Waiting List of all eligible applicants. The property's Waiting List will apply only to the units **without** project-based VASH subsidy vouchers. Applicants must be placed on the Waiting List and selected from the Waiting List even in situations where there are vacancies and the application is processed upon receipt. This procedure is necessary to assure the complete and accurate processing of all documentation for all applicants.

Willow Housing has one Waiting List (per bedroom size) that is established and maintained in chronological order as assigned during the initial lease-up. When the Waiting List is reopened, all applications received will be added to the existing waiting list in the order they are received. The Waiting List contains the following information for each applicant:

1. Address and/or Contact Information
2. Phone Number(s)
3. Unit Type/Size
4. Household Composition
5. Preference/Accessibility requirements
6. Income level

Applicants will have the opportunity to decline the first

apartment offered and retain their place on the waiting list. Should the applicant decline the offer of the next two available units, they will be removed from the waiting list.

Except for initial lease up, when the Waiting List include all applications received during the acceptance period, the Waiting List for studio units will be closed when it reaches 100, and the Waiting List for one-bedroom units will be closed when it reaches 30. Otherwise, the Waiting List will be open and applications shall be accepted.

If the Waiting List is less than 50% U.S. Veterans or if the Waiting List includes fewer than 30 U.S. Veterans, then management will perform a 45-90 day search for eligible U.S. Veterans to expand the waiting list with eligible U.S. Veterans who shall receive priority placement ahead of non-U.S. Veterans on the waiting list.

PURGING THE WAITING LIST

The Waiting List will be purged periodically. Each applicant will receive a letter from the property, which will request updated information and ask about their continued interest. A copy of the letter will also be sent to the applicant's service provider and alternate contact listed on the application. This letter must be returned within the specified time or their application will be removed from the Waiting List. It is the responsibility of the applicant, applicant's service provider or applicant's alternate contact to maintain a current address with the office in order to receive waitlist correspondence. Any correspondence returned undeliverable will result in application being removed from the waitlist.

UNIT TRANSFER POLICY

A Unit Transfer List is maintained for those residents who have been approved for transfer. Unit transfers are permitted for current residents who need:

a. A unit transfer because of family size;
b. A new unit because of changes in family composition;
c. A unit transfer for a medical reason certified by a third party professional; or
d. A unit transfer based on the need for an accessible unit; or
e. As a reasonable accommodation for a disability, including mental health conditions.

Assignments of apartments will alternate between residents on the unit transfer list and applicants from the waiting list. With exception that transfers as reasonable accommodations for medical or mental health reasons will take priority over applicants from the Waiting List, and units with features for the disabled will be offered first to those that need these features.

OCCUPANCY STANDARDS

Occupancy standards are the criteria established for matching a household with the most appropriate size and type of apartment. "Two plus one" occupancy guidelines will be followed to avoid under or over utilization of the units as follows:

Bedroom	**Household Minimum**	**Household Maximum**
Studio	1	2
1	2	3

To determine the proper bedroom size for which a household may qualify, the following household members are to be included:

1. All full-time members of the household, and
2. Live-in attendants.
3. Foster children
4. Unborn children
5. Children in the process of adoption.

NOTE: Live-in attendants are subject to the criminal and landlord provisions of this plan with the exception of criteria that

determines ability to pay rent. Exceptions to these Occupancy Standards may be made when required as a reasonable accommodation for a disabled household member.

DISCLOSURE OF SOCIAL SECURITY NUMBERS (HUD-VASH units ONLY)

All applicants for assistance and program participants must disclose the social security numbers (SSNs) assigned to themselves and all members of their household. Exemptions are provided for:

- Non-citizens who do not contend eligible immigration status. Assistance to these household members will be prorated.
- Current participants who are 62 years of age or older as of January 31, 2010, whose initial determination of eligibility was begun before January 31, 2010.
    - Qualifying seniors are exempt from the SSN disclosure mandate for all future examinations, even if the senior moves to a new HUD-assisted property.

Documents required in order to verify the SSNs include:

- A valid SSN card issued by the Social Security Administration;
- An original document issued by a federal or state government agency, which contains the name, SSN, and other identifying information of the individual; or,
- Other acceptable documents that are listed in Appendix 3 of the HUD handbook 4350.3.

New household members under the age of 6 who already have a SSN are subject to the same disclosure and verification requirements as new household members who are at least 6 years of age. For new members who have not been assigned a SSN, a 90 day period for verification is allowed. If the household does not provide the SSN and verification within 90 days due to unforeseen circumstances outside the resident's control, HA will grant an extension of one additional 90-day period.

RESTRICTION ON ASSISTANCE TO NON-CITIZENS (HUD-VASH units ONLY)

By law, only US citizens and eligible non-citizens are eligible for rental assistance. All family members, regardless of age, must declare their citizenship or immigration status. The following documents are required:

1. Family Summary Sheet and Owner Summary Sheet (lists all household members who will reside in the assisted unit)
2. Citizenship Declaration (Each household member listed must complete. Parents will complete and sign for household members under 18)
3. Forms and/or evidence of citizenship/immigration status.

Applicants that are U.S. Citizens must sign a declaration of citizenship and provide documents as proof of citizenship. Verification of the declarations will be completed.

Applicants that are Non-citizens claiming eligible status must sign a declaration of eligible immigration status, consent form and provide a DHS-approved document.

Non-citizens not claiming eligible immigration status must sign a declaration that they are not claiming eligible immigration status.

The manager is required to verify the validity of documents submitted by the applicant with the Department of Homeland Security (DHS) through their automated verification system. An applicant that provides documentation but is later determined by the DHS to be invalid documentation will have the assistance removed for that household member. Non-citizens age 62 and older must provide proof of age and sign a declaration that they have eligible immigration status.

Mixed families, a family that contains both eligible and non-eligible members may receive prorated assistance. Applicants who hold non-citizen student visas and non-citizens living with the student are considered ineligible for assistance.

Applicants who cannot provide documentation of eligible immigration status at the time of the applicant interview will be given a 14 day period to provide this documentation, if they provide a certification that the documentation is temporarily unavailable. Provided that at least one family member has provided documentation, the family may move in with prorated assistance provided they are otherwise eligible. Families that are found to be ineligible have the right to appeal the decision. The notice of ineligibility will describe the applicants' options.

RESTRICTION ON ASSISTANCE TO STUDENTS (HUD-VASH only)

Student's eligibility for HUD-VASH assistance will be determined at move-in, annual recertification, initial certification (when in-place residents begins receiving HUD-VASH assistance), and at the time of an interim recertification if one of the family composition changes reported is that a household member is enrolled as a student.

A student enrolled in an Institute of Higher Education as defined by the Higher Education Act of 1965-Amended 1998 will be deemed eligible for assistance if the student meets all other eligibility requirements, passes screening criteria and is:

1) Living with parents/guardians or
2) 24 years of age or older or
3) **A veteran of the United States Military** or
4) Married or
5) Has a dependent child or
6) Can prove independence of parents including
    a. Providing certification that parents did not claim the student on the most recent tax return
    b. The student has lived separate of the parents for at least one year or the student meets the Department of Education's definition of an independent student.
7) Is disabled and was receiving Section 8 assistance as of November 30, 2005
8) Has parents who are income eligible for the Section 8 program

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

If an ineligible student is a member of an applicant household or an existing household receiving Section 8 assistance, the assistance for the household will not be prorated but will be terminated.

VIOLENCE AGAINST WOMEN ACT OF 2005

The Violence Against Women Act of 2005 (VAWA) applies to HUD-VASH units (Willow Housing) and offers the **following protections against eviction or denial of housing based on domestic violence, dating violence or stalking:**

A. An applicant's or program participant's status as a victim of domestic violence, dating violence or stalking is not a basis for denial of rental assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission.

B. An incident or incidents of actual or threatened domestic violence, dating violence or stalking

will not be construed as serious or repeated violations of the lease or other "good cause" for terminating the assistance, tenancy, or occupancy rights of a victim of abuse.

C. Criminal activity directly related to domestic violence, dating violence or stalking, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, shall not be cause for termination of assistance, tenancy, or occupancy rights of the victim of the criminal acts.

D. Assistance may be terminated or a lease "bifurcated" in order to remove an offending household member from the home. Whether or not the individual is a signatory to the lease and lawful tenant, if he/she engages in a criminal act of physical violence against family members or others, he/she stands to be evicted, removed, or have his/her occupancy rights terminated. This action is taken while allowing the victim, who is a tenant or a lawful occupant, to remain.

E. The provisions protecting victims of domestic violence, dating violence or stalking engaged in by a member of the household, may not be construed to limit Willow Housing, when notified, from honoring various court orders issued to either protect the victim or address the distribution of property in case a family breaks up.

F. The authority to evict or terminate assistance is not limited with respect to a victim that commits unrelated criminal activity. Furthermore, if Willow Housing can show an actual and imminent threat to other tenants or those employed at or providing service to the property if an unlawful tenant's residency is not terminated, then evicting a victim is an option, the VAWA notwithstanding. Ultimately, Willow Housing will not subject victims to more demanding standards than other tenants.

The VAWA protections shall not supersede any provision of any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence or stalking. The laws offering greater protection are applied in instances of domestic violence, dating violence or stalking.

DENIAL OF ADMISSION

Any of the following could be grounds for denial of admission:

1. Total family income exceeds the applicable income limits published by HUD and CTCAC or does not meet the minimum income limit except where there is subsidy or rental assistance.

2. Applicant's household size either exceeds or is below reasonable occupancy limits for the available unit or unit applied for: studio-bedroom units 1-2 persons; one-bedroom units 2-3 persons. (Notes: an unborn child will be considered a household member to determine family size.).

3. Household cannot pay the full security deposit at move-in. Leasing staff will coordinate with HomeFirst and other case management staff to connect applicants with deposit assistance programs. Applicant will be given two weeks from the date an offer is made to obtain security deposit assistance. Deposit amount is stated in leasing application packet.

4. Household refuses to accept the third offer of an

apartment after communicated to the applicant and their listed Alternate Contacts.

5. Household fails to respond to interview letters or otherwise fails to cooperate with the certification process. Failure to sign consent forms.

6. ALL adult household members fail to attend eligibility interview.

7. Household is composed entirely of full time students and does not meet the exception outlined in Section 42 of the IRC.

8. Applicant has failed to provide adequate verification of income or we are unable to adequately verify income and/or income sources.

9. Providing or submitting false or untrue information on your application or failure to cooperate in any way with the verification process.

10. Unit assignment will NOT be the family's sole place of residency. Qualification for a unit includes occupying the unit on a continuous basis and as a primary residence. Residents may not be absent from the unit for more than 60 consecutive days, or for longer than 180 continuous days for medical reasons.

11. Applicant is unable to provide identification that verified their identity.

12. Applicant submits an incomplete application and takes no steps to remedy.

13. Applicant provides false, inconsistent or inaccurate information on their application.

14. Applicant has three failures to attend an agreed-upon time for an application appointment or interview.

15. Applicant was abusive with management during the application process.

16. Applicant has a violent or drug-related felony conviction within the past 5 years, or more than one misdemeanor within the last year related to threatening property staff or residents.

17. At least one person in the household must be of legal age to execute a lease (age 18). If the applicant is under legal age, proof of legal emancipation will be required in order to lease.

18. Any altered information and/or deliberate misinformation regarding income; current status or past history will disqualify an applicant.

DENIAL OF ASSISTANCE BY HOUSING AUTHORITY (HUD-VASH)

19. Any household member who is subject to a lifetime registration requirement under a state sex offender registration program.

20. Household exceeds current income limits for the HUD-VASH Program.

LANDLORD REFERENCE

21. Tax Credit guidelines require applicants to disclose the most recent consecutive two year housing history even if

the household is homeless. All applicants must complete the rental history portion of the application. **If you are currently homeless or were homeless within the past two years write on the application "homeless" and the City and State where you reside.**

22. Any substantiated evidence of current illegal activity including drug or gang related activities or threats to property staff or the residents.

CREDIT

23. Each adult member must agree to a credit check but will not be denied based on any credit criteria.

CRIMINAL

24. Please see attached criminal background criteria.
    Conviction of any household member of a violent or drug related felony within the past five (5) years. The applicant may be considered and accepted with past drug-related convictions related to the personal use of illegal substances less than 5 years old if the applicant has completed drug rehabilitation and can provide verification of completion of rehabilitation from a qualified agency. The applicant will be considered if a request is made under a Reasonable Accommodation.

25. Conviction of any household member of more than one (1) misdemeanor related to threatening property staff or residents in the past year.

GRIEVANCE/APPEAL PROCESS

Should the applicants fail to meet the screening criteria, the applicant and their listed service provider and alternate contact will receive a notice in writing indicating that they have the right to appeal the decision. This notice must indicate that the applicant has 21 days to dispute the decision.

An appeal meeting with the Property Supervisor will be held within 10 business days of receipt of the applicant's request.

Within five days of the appeal meeting, the property will advise the applicant in writing of the final decision regarding eligibility.

OPENING/CLOSING OF WAITING LIST

Vacancies at Willow Housing and the Waiting List will be monitored regularly to ensure that there are enough applicants to fill vacancies. Furthermore, the Waiting List will be monitored to ensure that the list does not become so long that the wait for a unit becomes excessive.

The Waiting List may be closed for one or more unit sizes when the average wait is excessive (e.g. two years or more).

When the Waiting List is closed, we will advise potential applicants that the Waiting List is closed and refuse to take additional applications. When Willow Housing decides to no longer accept applications, we will publish a notice to that effect in publications likely to be read by potential applicants. The notice will state the reasons for refusal to accept additional applications.

When Willow Housing agrees to accept applications again, the notice of this action will be announced in publications likely to be read by potential applicants in the same manner (same publications listed on the AFHMP) as the notification that the waiting list was closed. The notifications will be extensive, and the rules for applying and the order in which applications will be processed will be stated.

Advertisements will include where and when to apply and will conform to the advertising and outreach activities described in the AFHMP.

Enterprise Income Verification (EIV) (HUD-VASH units ONLY)

In an effort to ensure the right assistance is provided to the right people, The Department of Housing and Urban Development (HUD) has provided property managers with access to a verification database called the Enterprise Income Verification System (EIV). HA utilizes EIV during the certification process for applicants and residents. All adult applicants and residents must give consent to the release of this information by signing HUD Forms 9887 and 9887A.

HA will utilize the EIV **Existing Tenant Search** at the time applications are processed to determine if household members are currently residing at another Multifamily Housing or Public and Indian Housing (PIH) location. EIV gives HA the option to query both the TRACS and Public and Indian Housing's (PIH's) Information Center (PIC) databases.

Nothing prohibits a housing assistance recipient from applying to this property. However, the applicant must not receive double subsidy.

If the applicant or a member of the applicant's household is receiving subsidy at another location, HA will discuss this with the applicant, giving the applicant the opportunity to explain any circumstances relative to the applicant being assisted at another location.

Depending on the outcome of the discussion, HA may need to follow-up with the respective PHA or O/A to confirm the individual's program participation status before admission. The **Existing Tenant Search** report gives HA the ability to coordinate move-out and move-in dates with the PHA or O/A of the property at the other location.

EMPLOYMENT VERIFICATION – THE WORK NUMBER (NON-PB-VASH units)

At **initial move-in** into a tax credit unit, CTCAC policy **requires** that all resident files contain 3rd party verification for all wage earners in the form of a Verification of Employment (VOE) along with **3 months of recent consecutive pay-stubs**. CTCAC requires a Verification of Employment (VOE) for all initial applicants including those wage earners that can only be verified via the Work Number. CTCAC allows owners of the community to **pass on the cost of the verification to the applicant**. This will ensure there is a VOE **and** pay-stubs for all wage earners at initial move-in, in the resident files as requested by CTCAC.

Applicants with wage earnings that can only be verified via The Work Number **will be charged** the cost to obtain the Verification of Employment **(VOE).**

During Annual Recertification we are no longer required to supply a VOE from the Work Number, **as long as 3 months of recent consecutive pay-stubs are included** in the file. If a resident cannot provide 3 months of consecutive pay-stubs, verification via The Work Number will be required and the cost for the VOE at annual recertification will be passed on to the resident. Costs to obtain a VOE from the Work Number will not be passed on to participants of the Project Based Section 8 program.

Residents with earnings that can **only** be verified via The Work Number because 3 months of recent consecutive pay-stubs could not be provided by the resident will be charged the cost to obtain the Verification of Employment (VOE).

AVAILABILITY OF RESIDENT SELECTION PLAN

The Resident Selection Plan shall be posted in a conspicuous and public area at the site. Changes to the Plan will be sent via

U.S. mail to all persons on the active Waiting List. When the Waiting List opens, the Resident Selection Plan will be distributed with applications and are available by request from management.

ANNUAL RECERTIFICATION REQUIREMENTS

All residents must recertify annually. An Annual Recertification Notice will be mailed to each resident 120 days prior to their move-in anniversary date informing each resident that we must begin the process for annual recertification of income and rent re-determination for the property. The letter will include the date/time of your scheduled interview and a list of documents to bring to the interview. The recertification process is similar to the move-in process. Residents should save bank statements, award letters, paystubs and any other income and/or asset documentation that will assist in the annual recertification process.

Proposed changes of household composition and student status must be reported to Management immediately.

PETS

Residents are permitted to keep one common household pet in the dwelling unit. The household pet may not exceed 30 pounds and is required to comply with the provisions of the Animal Policy. A pet deposit is required, and the amount will be stated in the Animal Policy. SERVICE or ASSISTANCE animals are not considered pets. Service or Assistance animals are those animals specifically required to assist individuals with documented disabilities. Service and Assistance animals are not subject to the pet deposit. Please notify Management if you require a Service or Assistance animal.

EQUAL HOUSING OPPORTUNITY

Willow Housing is an equal opportunity housing provider admitting applicants in accordance with local, state and Federal Fair Housing laws.

Managed by:

EAH

A NON-PROFIT HOUSING CORPORATION

Expanding the range of opportunities for all by developing, managing and promoting quality affordable housing and diverse communities since 1968.
Willow Housing is an equal opportunity housing provider.