

# Proposed changes to the RHA HCV waitlist preferences

## Chapter 4

### APPLICATIONS, WAITING LIST AND TENANT SELECTION

#### INTRODUCTION

When a family wishes to receive Section 8 HCV assistance, the family must submit an application that provides RHA with the information needed to determine the family's eligibility. HUD requires RHA to place all families that apply for assistance on a waiting list. When HCV assistance becomes available, RHA must select families from the waiting list in accordance with HUD requirements and RHA policies as stated in the administrative plan and the annual plan.

RHA is required to adopt a clear approach to accepting applications, placing families on the waiting list, selecting families from the waiting list and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or RHA to receive preferential treatment. Funding earmarked exclusively for families with particular characteristics may also alter the order in which families are served.

HUD regulations require that all families have an equal opportunity to apply for and receive housing assistance, and that RHA affirmatively further fair housing goals in the administration of the program [24 CFR 982.53, HCV GB p. 4-1]. Adherence to the selection policies described in this chapter ensures that RHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and RHA policies for taking applications, managing the waiting list and selecting families for HCV assistance. The policies outlined in this chapter are organized into three sections, as follows:

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

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

Part III: Selection for HCV Assistance. This part describes the policies that guide RHA in selecting families for HCV assistance as such assistance becomes available. It also specifies how in-person interviews will be used to ensure that RHA has the information needed to make a final eligibility determination.

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## PART I: THE APPLICATION PROCESS

### 4-I.A. OVERVIEW

This part describes the policies that guide RHA's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes RHA's obligation to ensure the accessibility of the application process to elderly persons, people with disabilities, and people with limited English proficiency (LEP).

### 4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16, Notice PIH 2009-36]

Any family that wishes to receive HCV assistance must apply for admission to the program. HUD permits RHA to determine the format and content of HCV applications, as well how such applications will be made available to interested families and how applications will be accepted by RHA. However, RHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of RHA's application.

#### RHA Policy

Depending upon the length of time that applicants may need to wait to receive assistance, RHA may use a one- or two-step application process.

- A one-step process will be used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and level of assistance.
- A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, RHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.

When the RHA HCV waiting list is open, families may obtain application forms from the RHA's website at [www.rochesterhousing.org](http://www.rochesterhousing.org) or at RHA's Application Processing or Leasing Operations Departments during normal business hours. Additional locations where the application will be available will be provided in any public notices advertising the opening of the waiting list. Families may also request, by telephone or by mail, that a form be sent to the family via first class mail.

Completed applications must be returned to the RHA online through the RHA website, by mail, or in person at the RHA offices during normal business hours. RHA will not accept in person applications when the two-step application process is in effect.

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### **4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS**

#### **Elderly and Disabled Populations [24 CFR 8 and HCV GB, pp. 4-11 – 4-13]**

RHA must take a variety of steps to ensure that the application process is accessible to families who might have difficulty complying with the normal, standard RHA application process. This could include people with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). RHA must provide reasonable accommodation to the needs of individuals with disabilities. The application-taking facility and the application process must be fully accessible, or RHA must provide an alternate approach that provides full access to the application process. Chapter 2 provides a full discussion of RHA's policies related to providing reasonable accommodations for people with disabilities.

#### **Limited English Proficiency**

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

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## **4-I.D. PLACEMENT ON THE WAITING LIST**

RHA must review each complete application received and make a preliminary assessment of the family's eligibility. RHA must accept applications from families for whom the list is open unless there is good cause for not accepting the application (such as denial of assistance) for the grounds stated in the regulations [24 CFR 982.206(b)(2)]. Where the family is determined to be ineligible, RHA must notify the family in writing [24 CFR 982.201(f)]. Where the family is not determined to be ineligible, the family will be placed on a waiting list of applicants.

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list [24 CFR 982.202(c)].

Applications must be complete to be accepted by RHA for processing. If an application is incomplete, RHA will notify the family of the additional information required. RHA will make one attempt to reach an applicant regarding an incomplete application. If RHA is unable to obtain the information necessary, the applicant will not be placed on the waiting list. If the information is provided at a later date, the submission date and time of the application for placement on the wait list will be based on the date and time the information was obtained by RHA. If the waitlist is not open when the information is received, the applicant will not be placed on the waitlist except in cases of an approved reasonable accommodation.

### **Ineligible for Placement on the Waiting List**

#### RHA Policy

If RHA can determine from the information provided that a family is ineligible, the family will not be placed on the waiting list. Where a family is determined to be ineligible, RHA will send written notification of the ineligibility determination within 10 business days of receiving a complete application. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review and explain the process for doing so (see Chapter 16).

A person that is the head of household, spouse, or significant other of a current household subsidized in the HCV Program cannot simultaneously have his/her name on the waiting list for the voucher program.

### **Eligible for Placement on the Waiting List**

#### RHA Policy

RHA will send written notification of the preliminary eligibility determination within 60 business days of receiving a complete application.

Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

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Applicants will be placed on the waiting list according to any preference(s) for which they claim they qualify for, and the date and time their complete application is received by RHA. RHA will not be verifying preference status at the time of initial application. If it is found that an applicant does not qualify for the stated preference at the time RHA determines eligibility, the applicant will be placed back on the wait list according to any preference(s) they qualify for, and the date and time their complete application was received.

An applicants position on the waitlist cannot be changed other than by a change in preference. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or RHA to receive preferential treatment. Funding earmarked exclusively for families with particular characteristics may also alter the order in which families are served.

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## PART II: MANAGING THE WAITING LIST

### 4-II.A. OVERVIEW

RHA must have policies regarding various aspects of organizing and managing the waiting list of applicant families. This includes opening the list to new applicants, closing the list to new applicants, notifying the public of waiting list openings and closings, updating waiting list information, purging the list of families that are no longer interested in or eligible for assistance, as well as conducting outreach to ensure a sufficient number of applicants.

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

### 4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]

RHA's HCV waiting list must be organized in such a manner to allow RHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

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

- Applicant name;
- Family unit size;
- Household composition;
- Date and time of application;
- Qualification for any local preference;
- Racial or ethnic designation of the head of household.

#### RHA Policy

RHA will maintain a single waiting list for the HCV program.

RHA will maintain separate waiting lists for the Project Based Voucher and Public Housing Programs. An RHA partner agency will maintain separate waiting lists for each of the Moderate Rehabilitation/Single Room Occupancy Program, HUD-VASH Program, Shelter Plus Care Programs, and Nursing Home Transition and Diversion Program.

HUD directs that a family that applies for assistance from the HCV program must be offered the opportunity to be placed on the waiting list for any public housing, project-based voucher or moderate rehabilitation program RHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs.

A family's decision to apply for, receive, or refuse other housing assistance will not affect the family's placement on the HCV waiting list, or any preferences for which the family may qualify.

#### RHA Policy

RHA will not merge the HCV waiting list with the waiting list for any other program RHA operates.

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## **4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]**

### **Closing the Waiting List**

RHA is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, RHA may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria. RHA is not required to provide a public notice to close the waiting list.

#### RHA Policy

RHA will close the waiting list when the estimated waiting period for housing assistance for applicants on the list reaches 24 months for the most current applicants.

RHA will continue to accept applications for Local Preferences 1 through 9 identified in section 4-III.C. and programs identified under Targeted Funding 4-III.B (unless otherwise stated in the program description in that section) even when the tenant based HCV waitlist is closed.

### **Reopening the Waiting List**

If the waiting list has been closed, it cannot be reopened until RHA publishes a notice in local newspapers of general circulation, minority media, and other suitable media outlets. The notice must comply with HUD fair housing requirements and must specify who may apply, and where and when applications will be received.

#### RHA Policy

RHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice.

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

- The RHA Website and RHA Announcement Boards
- Democrat and Chronicle
- Messenger Post Media
- Renter's Guide
- Minority Reporter

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### **4-II.D. FAMILY OUTREACH [HCV GB, pp. 4-2 to 4-4]**

RHA must conduct outreach as necessary to ensure that RHA has a sufficient number of applicants on the waiting list to use the HCV resources it has been allotted.

Because HUD requires RHA to serve a specified percentage of extremely low income families (see Chapter 4, Part III), RHA may need to conduct special outreach to ensure that an adequate number of such families apply for assistance [HCV GB, p. 4-20 to 4-21].

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

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

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

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

#### RHA Policy

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

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### **4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES**

#### RHA Policy

While the family is on the waiting list, the family must immediately inform RHA of changes in contact information, including current residence, mailing address, and phone number; along with changes in family size, family composition, and changes in preference(s). The changes must be submitted in writing.

### **4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]**

HUD requires RHA to establish policies to use when removing applicant names from the waiting list.

#### **Purging the Waiting List**

The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to an RHA request for information or updates because of the family member's disability, RHA must reinstate the applicant family to their former position on the waiting list [24 CFR 982.204(c)(2)].

#### RHA Policy

RHA will attempt to purge the waiting list annually to ensure that all applicants and applicant information is current and timely.

To update the waiting list, RHA will send an update request via first class mail to either each family on the waiting list or families expected to be reached within the next 12 months to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that RHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

If required by RHA, the family's response must be in writing and may be delivered in person, by mail, or by fax. Responses should be postmarked or received by RHA not later than 15 business days from the date of RHA letter.

If the family fails to respond within 15 business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date the letter was re-sent.

If a family is removed from the waiting list for failure to respond, the Executive Director, or his/her designee, may reinstate the family if s/he determines the lack of response was due to RHA error, or to circumstances beyond the family's control.

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### **Removal from the Waiting List**

#### RHA Policy

If at any time an applicant family is on the waiting list, RHA determines that the family is not eligible for assistance (see Chapter 3), the family will be removed from the waiting list.

If a family is removed from the waiting list because RHA has determined the family is not eligible for assistance, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding RHA's decision (see Chapter 16) [24 CFR 982.201(f)].

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## **PART III: SELECTION FOR HCV ASSISTANCE**

### **4-III.A. OVERVIEW**

As vouchers become available, families on the waiting list must be selected for assistance in accordance with the policies described in this part.

The order in which families receive assistance from the waiting list depends on the selection method chosen by RHA and is impacted in part by any selection preferences that the family qualifies for. The source of HCV funding also may affect the order in which families are selected from the waiting list.

RHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to RHA's selection policies [24 CFR 982.204(b) and 982.207(e)].

### **4-III.B. SELECTION AND HCV FUNDING SOURCES**

#### **Special Admissions [24 CFR 982.203]**

HUD may award funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In cases of HUD Special Admissions awards, RHA may admit families that are not on the waiting list, or without considering the family's position on the waiting list. RHA must maintain records showing that such families were admitted with special program funding.

#### **Targeted Funding [24 CFR 982.204(e)]**

HUD may award RHA funding for a specified category of families on the waiting list. RHA must use this funding only to assist the families within the specified category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

#### RHA Policy

RHA administers the following types of targeted funding:

- Family Unification Program Vouchers – vouchers for families whom lack adequate housing that may lead to the separation of children from their families or may prevent the reunification of children with their families. If there are no qualified families identified from the HCV waitlist, The Child and Family Services Division of the Monroe County Department of Human Services will refer potential families to be added to the waiting list, whether the general waitlist is opened or closed.
- HUD-VASH Vouchers – vouchers for homeless veterans. The VAMC will refer HUD-VASH eligible families to RHA for the issuance of vouchers. Participants will not be selected from the RHA waitlist.
- Shelter Plus Care Programs – Programs provide housing assistance and support services for qualified homeless and disabled families. Waitlists for each program will be managed by the RHA program sponsor partners.

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- Mainstream Program Vouchers – vouchers that enable families having a person with disabilities to lease affordable private housing of their choice or to assist persons with disabilities who often face difficulties in locating suitable and accessible housing in the private market. Qualified families will be selected from the HCV waitlist. RHA will reopen the HCV waitlist if there are not enough eligible applicants on the list to fill available vouchers under this category.
- Designated Housing Vouchers – Non-elderly families having a person with disabilities. Families are first selected from potential RHA public housing residents that have been designated to move into a disabled unit where no qualifying units are available, next would be qualified families from the RHA public housing waitlist, and then qualified families from the HCV waitlist. RHA will reopen the HCV waitlist if there are not enough eligible applicants on the list to fill available vouchers under this category.
- Nursing Home Transition and Diversion Program - funded by NYS, a program created through a partnership between NYS DHCR and the NYS Department of Health (DOH) to provide alternative housing and in home services instead of nursing home placement for people with disabilities ages eighteen (18) or over and seniors. The DOH or their designated agencies will refer eligible families to RHA for the issuance of vouchers. Participants will not be selected from the RHA waitlist.

### **Regular HCV Funding**

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

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## 4-III.C. SELECTION METHOD

RHA must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that RHA will use [24 CFR 982.202(d)].

### **Local Preferences [24 CFR 982.207; HCV p. 4-16]**

RHA is permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits RHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with RHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

#### RHA Policy

Local preferences will be numerically ranked, with number 1 being the highest preference, in the following order:

1. Families that have been terminated from RHA's HCV program due to insufficient program funding.
2. Families living in units receiving RHA project-based voucher assistance that have fulfilled their one year occupancy requirement under the project based voucher program and have not violated any family obligations under the HCV program.
3. Families in a RHA public housing development that have a family member(s) that is/are a victim of domestic violence. To qualify for this preference:

Actual or threatened physical violence directed against the family member(s) by a spouse or other household member who lives in the unit with the family must have occurred within the past 60 days or be of a continuing nature. RHA will require written verification from the police, a social service agency, the court, a clergy person, a physician, and/or a public or private facility giving shelter and/or counseling to victims. The documentation must verify that the family has been displaced as a result of fleeing violence in the home or they are currently living in a situation where they are being subjected to or victimized by violence in the home, and identify when the actual or threatened physical violence against the applicant last occurred. The family must certify that the abuser will not return to the household without the advance written approval of RHA. RHA can not have any suitable public housing units available for the family.

4. To avoid reprisals because the family provided information on criminal activities to a law enforcement agency and, after a threat assessment, the law enforcement agency recommends relocating the family to avoid or reduce risk of violence against the family. The family must be part of a Witness Protection Program, or the HUD Office or law enforcement agency must have informed RHA that the family is part of a similar program.

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5. With proper documentation, families who are victims of a natural disaster. Natural disasters include, but are not limited to floods, tornadoes, hurricanes, earthquakes and tsunamis. Proper documentation includes, but is not limited to written statements from disaster relief agencies such as Federal, State or local Emergency Management Agencies, the Red Cross and other Federal, State or local agencies either within or outside the jurisdiction where the natural disaster occurred.
6. Families in a RHA public housing development displaced due to the demolition or disposition of the public housing unit, this preference will be provided only when HUD does not award special funding for relocation and where RHA does not have any suitable public housing units available for the family.
7. Families affected by an owner's or RHA's decision to opt-out of a project based Section 8 contract or Shelter Plus Care grant will receive a voucher to allow the family to relocate or remain in an affordable unit. The voucher size (i.e., number of bedrooms) is based on the number of family members identified on the assisted lease for the affected project.
8. HUD-VASH voucher holders only, not veteran families referred to RHA through the VAMC or other veteran families. Under the VASH Program, when the VA determines that the participant family no longer requires case management and have not violated any family obligations under the HUD-VASH program. Up to 10 HUD-VASH set aside vouchers will be available per calendar year.
9. Shelter Plus Care participants where the Program Sponsor/Case Manager determines that the participant family no longer requires case management and have not violated any family obligations under the S+C program. Participants must remain in the S+C program for at least two years prior to being eligible for a voucher. Up to 100 S+C set aside vouchers will be available per calendar year.
10. All families with children and families who include an elderly person or a person with a disability (see 24 CFR 100.80). To qualify for a family with children preference RHA will require proof of guardianship and proof of current residence of children in the family. To qualify for an elderly preference RHA will require verification of the age of the head, spouse/cohead, or sole family member. To qualify for a disability preference RHA will require appropriate documentation from a knowledgeable professional confirming the presence of a qualifying disability. RHA will not inquire as to the nature or extent of the disability. An award letter or other proof of eligibility for Social Security Disability or Supplemental Security Income will be acceptable.
11. Families where the head, spouse/cohead, or sole member is employed at least 30 hours per week. This preference is available for families with at least one member who is employed. RHA will require a statement from the employer verifying current employment status and minimum number of hours worked per week.
12. All other eligible families.

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### **Income Targeting Requirement [24 CFR 982.201(b)(2)]**

HUD requires that extremely low-income (ELI) families make up at least 75% of the families admitted to the HCV program during RHA's fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, RHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

#### RHA Policy

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

### **Order of Selection**

RHA system of preferences may select families either according to the date and time of application, or by a random selection process [24 CFR 982.207(c)]. When selecting families from the waiting list RHA is required to use targeted funding to assist only those families who meet the specified criteria, and RHA is not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

#### RHA Policy

Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with RHA's hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by RHA. Documentation will be maintained by RHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that RHA does not have to ask higher placed families each time targeted selections are made.

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### **4-III.D. NOTIFICATION OF SELECTION**

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

#### RHA Policy

RHA will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:

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

- Who is required to attend the interview

- Documents that must be provided at the interview to document the legal identity of household members, including information about what constitutes acceptable documentation

- Other documents and information that should be brought to the interview

If a notification letter is returned to RHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's address of record, as well as to any known alternate address.

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### 4-III.E. THE APPLICATION INTERVIEW

HUD recommends that RHA obtain the information and documentation needed to make an eligibility determination through a private interview [HCV GB, pg. 4-16]. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if RHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by RHA [Notice PIH 2010-3].

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability.

#### RHA Policy

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

The head of household and the spouse/cohead will be strongly encouraged to attend the interview together. However, either the head of household or the spouse/cohead may attend the interview on behalf of the family. Verification of information pertaining to adult members of the household not present at the interview will not begin until signed release forms are returned to RHA.

The interview will be conducted only if the head of household or spouse/cohead provides appropriate documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity). If the family representative does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained.

Pending disclosure and documentation of social security numbers, RHA will allow the family to retain its place on the waiting list for **60 days**. If not all household members have disclosed their SSNs at the next time RHA is issuing vouchers, RHA will issue a voucher to the next eligible applicant family on the waiting list.

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation. If any materials are missing, RHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).

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

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

If the family is unable to attend a scheduled interview, the family should contact RHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, RHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without RHA approval will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in Chapter 3.

### **4-III.F. COMPLETING THE APPLICATION PROCESS**

RHA must verify all information provided by the family (see Chapter 7). Based on verified information, RHA must make a final determination of eligibility (see Chapter 3) and must confirm that the family qualified for any special admission, targeted admission, or selection preference that affected the order in which the family was selected from the waiting list.

#### RHA Policy

If RHA determines that the family is ineligible, RHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review (Chapter 16).

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low-income), the family will be returned to its original position on the waiting list. RHA will notify the family in writing that it has been returned to the waiting list, and will specify the reasons for it.

If RHA determines that the family is eligible to receive assistance, RHA will invite the family to attend a briefing in accordance with the policies in Chapter 5.