

Chapter 4

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

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

The PHA is required to adopt clear policies and procedures for accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow these policies and procedures consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA that justify their selection. Examples of this are the selection of families for income targeting and the selection of families that qualify for targeted funding.

HUD regulations require that all families have an equal opportunity to apply for and receive housing assistance, and that the PHA 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 the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and PHA policies for 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 the PHA will handle the applications it receives.

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

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

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the PHA policies for making applications available, accepting applications, making preliminary determinations of eligibility, and the placement of applicants on the waiting list. This part also describes the PHA'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 the PHA 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 the PHA. The PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application.

GHA Policy

Application Process:

The GHA has elected to use a Centralized Application and Waiting List process. HUD has encouraged PHAs to use a centralized waiting list.

In the Commonwealth of Massachusetts, the "Massachusetts Section 8 Centralized Waiting List" (the Centralized Waiting List) is administered by the Massachusetts Chapter of the National Association of Housing and Redevelopment Officials (MassNAHRO) and its subcontractor, GoSection8. PHAs using the GoSection8 Centralized Waiting List are referred to in this Plan as "participating PHAs).

The Centralized Waiting List affords the GHA and its clients the following benefits:

1. Ease of application process for applicants, who may apply at the GHA office or any participating PHA's office, or online at www.gosection8.com/MassCWL;
2. Elimination of the procedural hardship for families and administrative burden to the participating PHAs of closing and opening the Section 8 HCV waiting list. The Centralized Waiting List generally is maintained as an open waiting list;
3. Increase in housing opportunities for families, who now have the option of placement at a number of locations throughout the Commonwealth through the submission of a single preliminary application.

The Centralized Waiting List process consists of two parts: (1) applicants submit a pre-application and are placed on the Centralized Waiting List and (2) applicants fill out an eligibility packet when they near or reach the top of the list. Eligibility for the program and any preferences is determined based on the more current information contained in the eligibility packet.

Acceptance of Applications:

A single, standardized Preliminary Application is available at each participating PHA and online at www.gosection8.com/MassCWL. A master list of all PHAs participating in the Centralized Waiting List is maintained at the office of MassNAHRO, and is available at each participating housing agency, and online at www.gosection8.com/MassCWL.

Any family asking to be placed on the Centralized Waiting List for Section 8 rental assistance will be given the opportunity to complete a pre-application. Only one Preliminary Application is accepted for each family.¹

The Preliminary Application requests information required to administer the Section 8 HCV program, such as: name and city or town where the head of household and spouse/partner live and work, telephone number, total number of family members, social security number (or Alien ID#) of all family members, disability or elderly (age 62 or over) status, total gross family income, race, and ethnicity.

Information is also requested to allow the PHA to apply any local preferences adopted by participating PHAs.

No determination of overall eligibility or eligibility for a preference is made at the point of filing the Preliminary Application. Every pre-application is entered into the Centralized Waiting List. At a later date, when the family is selected from the waiting list, the family will be required to complete an eligibility packet and provide current documentation of their income, assets, address and place of employment necessary to establish eligibility for the program and any preference for which the family applied. (See Section 4-III of this Plan).

MassNAHRO reserves the right to modify the Preliminary Application to change or include other information required or useful to administer the Section 8 HCV program.

Preliminary Applications are available for completion in person at the GHA during regular office hours. Blank Preliminary Applications will also be mailed or faxed to a family by any participating PHA for completion by the family.

Upon receipt of a Preliminary Application at the GHA Office, the Preliminary Application will be marked by the GHA staff with the date and time of submission, entered into the Centralized Waiting List system, and the family will be provided (usually by mail) with a standard receipt evidencing submission of the Preliminary Application. The receipt will provide the applicant with an Application ID number (commonly known as a Control Number), show the date and time of receipt of the application and the total of yearly household income from information provided by the applicant.

Preliminary Applications may also be submitted online anytime at www.gosection8.com/MassCWL. Applications sent to and received by GoSection 8 will

¹ An exception is when an application has been rejected by a participating PHA for a reason which may not make the family ineligible at another participating PHA. The family may then reapply to the PHA where the application was rejected to be placed on the Waiting List for that participating PHA according to a new date and time. The original application will remain in the system for all other PHAs where the family could potentially be eligible.

similarly be processed at which time an online receipt is generated and sent to the applicant.

Families are notified at the time of application that participating PHAs may have open waiting lists for other housing programs. If these other programs include units suitable for the applicant, the applicant should contact that PHA directly for placement on its waiting list for the other program(s). Information regarding the availability of many of these programs is online on the PHA website.

Upon completion of a Preliminary Application, if there is another open waiting list operated through GoSection8.com for any other program administered by any participating PHA for which an applicant may be eligible, the applicant will receive automatic notification on the website and by email. The applicant may elect to apply instantly online. In this instance, there is no need for the applicant to fill out an additional Preliminary Application.

A family may update its Preliminary Application (e.g. change of address) for Section 8 HCV assistance online at www.gosection8.com/MassCWL, or at the office of any PHA participating in the Centralized Waiting List application process, regardless of where the original Preliminary Application was submitted. To update the Preliminary Application through a PHA, a written request must be submitted to the PHA by the family.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

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

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

GHA Policy

Preliminary applications will be accepted without regard to race, color, sex, religion, familial status, age disability, national origin, marital status, gender identity, sexual orientation, receipt of public assistance or housing subsidy, ancestry, military or veteran status, or genetic information.

The GHA will provide reasonable accommodation as required by law to assist individuals with disabilities. Upon request, this may include provision of appropriate auxiliary aids and services necessary to ensure effective communication (e.g., braille, audio, large type, assistive listening devices, and sign language interpreters.) Reasonable accommodations may also include a change in policy or procedure to make the program accessible. Such requests will be considered and made as required according to applicable law. Applicants are advised of their right to request a reasonable accommodation on both the Centralized Waiting List website and on the Preliminary Application itself.

Persons with hearing and/or speech impairments may access the GoSection8 telephone number via text telephone (TTY) using Massachusetts Relay at 711 for English, and (866) 930-9252 for Spanish.

Limited English Proficiency

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

GHA Policy

GHA and other PHAs participating in the Centralized Waiting List, MassNAHRO, and GoSection8 will take reasonable steps to ensure meaningful access by persons with limited English proficiency (LEP). Such steps will include translation of common written materials into the languages frequently spoken by applicants. In addition, on an as-needed basis, GoSection8 or the participating PHA (depending upon the point of contact) may arrange for telephonic or in-person interpretation. The online Preliminary Application prompts applicants to select their preferred language; once selected, the Preliminary Application process will appear in that language. There are multiple languages available on the Centralized Waiting List website, including those most commonly encountered in Massachusetts with regard to LEP individuals. GoSection8 also has bilingual staff who speak English, Spanish, French, and Haitian Creole, and telephonic interpretation is available in any other needed languages.

4-I.D. PLACEMENT ON THE WAITING LIST

All applicants who submit a Preliminary Application will be placed on the Centralized Waiting List. Eligibility will be determined when the applicant is selected from the list. Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 982.201(f)]. Where the family is not determined to be ineligible, the family will remain on the 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)].

GHA Policy

Determination of Eligibility

Once a family has been selected from the Centralized Waiting List in the matter set forth in this Plan, the family will be required to complete an eligibility packet and provide current information and documentation of eligibility, including but not limited to: income, household composition, address, criminal history, and immigration status. From that information, the participating PHA will make a determination of the applicant family's eligibility for the Section 8 HCV program. The determination will be made according to federal law, regulations governing state law, and any applicable procedures set forth in the PHA's Administrative Plan.

Ineligible for Assistance

If the GHA determines from the information provided that a family is ineligible, the family may be removed from the Centralized Waiting List. Where a family is determined to be ineligible, the GHA will send written notification of the ineligibility determination within 10 business days of receiving a complete eligibility packet. 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).

Removal from the Waiting List will not occur until the appeal process² (when requested) has ended, or the time period for the family to request an appeal has expired. Appeal rights and procedures are governed by the applicable Code of Federal Regulations and the GHA Administrative Plan. This includes denials based upon CORI or Immigration Status.

A. Ineligibility for Assistance Based on PHA Policy – Removal from the Centralized Waiting List for a Particular PHA only:

If the family could be eligible under another participating PHA's policies, the GHA will not remove the family's name from the Centralized Section 8 HCV Waiting List. However, the family will not be selected by the GHA again unless a new Preliminary Application has been submitted to the GHA.

Certain mandatory denial categories could still result in removal from a particular PHA's list only due to a component of a PHA policy associated with the denial.

² Informal Review or Informal Hearing, as applicable.

For example, if a family does not qualify on the basis of citizenship or eligible immigration status as required in 24 CFR Part 5, Subpart E, GHA will require documentation to verify citizenship. Also, if a family does not meet the Social Security Number disclosure and documentation requirements as set forth in 24 CFR 5.216, the GHA may allow the family to retain its place on the Waiting List for 30 days. Additionally, a family may be denied by GHA for a conviction related to production or manufacture of methamphetamine in any location, not just on the premises of federally-assisted housing.

B. Mandatory Ineligibility for Assistance – Removal from the Centralized Waiting List for All PHAs:

If a family is removed from the GHA Waiting List due to mandatory ineligibility, the family's name will be removed from the Waiting List for all PHAs.

Mandatory grounds for removal include:

1. The family fails to sign and submit consent forms for obtaining information in accordance with 24 CFR 5, Subparts B and F (24 CFR 982.552(b)(3));
2. Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing as set forth in 24 CFR 982.553(a)(1)(ii)(c)(i);
3. Any household member is subject to a lifetime registration requirement under a state sex offender registration program as set forth in 982.553(a)(2)(i).

C. Mandatory Ineligibility for Assistance due to Income Limits – Removal from the Centralized List Dependent on Location for Income Limit Determination:

A family must be denied participation in the HCV program if its income exceeds the limit required for participation in the program pursuant to 24 CFR 982.201. In this circumstance, the family's name will be removed from the Centralized Section 8 HCV waiting list for the PHA making the determination and for all other PHAs in the area with income limits at or below the level of the PHA making the determination. The family's name will remain on the list for other participating PHAs in areas with income limits above that of the PHA making the denial. If the family later reapplies, it will be provided with a new (later) preliminary application date for the PHAs from which the family's name was previously removed due to income ineligibility.

PHAs may adopt specific policies to admit low-income families who meet additional eligibility criteria (such as for the VASH, Mainstream Voucher or Project-Bases program) specified in a PHA's Administrative Plan. This could impact that PHA's particular income limits. In this instance, the PHA will notify GoSection8 to ensure a different income level is not on file for the particular PHA regarding denials under this section.

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA 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 a PHA 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]

The PHA's HCV waiting list must be organized in such a manner to allow the PHA 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;
- Date and time of application;
- Qualification for any local preference;
- Racial or ethnic designation of the head of household.

HUD requires the PHA to maintain a single waiting list for the HCV program unless it serves more than one county or municipality. Such PHAs are permitted, but not required, to maintain a separate waiting list for each county or municipality served.

GHA Policy

The GHA will maintain a single waiting list for the HCV 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 the PHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs.

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs.

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

GHA Policy

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

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

Closing the Waiting List

A PHA is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, the PHA may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria.

GHA Policy

The GHA participates in the Massachusetts GoSection8 HCV Centralized Waiting List. The terms of participation require that the list remain open indefinitely. Therefore, the GHA will not close its list and will continue to accept applications indefinitely. If at any time the terms of participation in the GoSection8 HCV Centralized Waiting List program change, the GHA may elect to modify this policy based on the estimated wait for housing assistance.

The Centralized Waiting List opened in January 2013. At that time, notice of the opening of the waiting list was published in a local newspaper of general circulation and within minority media.

The list has remained open since that date. As individual PHAs join the Centralized Waiting List, the joining PHA gives notice by publication in a local newspaper of general circulation and also by minority media and/or other suitable means.

Reopening the Waiting List

If the waiting list has been closed, it cannot be reopened until the PHA 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.

GHA Policy

The GHA participates in the Massachusetts GoSection8 HCV Centralized Waiting List. The terms of participation require that the list remain open indefinitely. Therefore, the GHA will not close its list and will continue to accept applications indefinitely. If at any time the terms of participation in the GoSection8 HCV Centralized Waiting List program change, the GHA may elect to modify this policy based on the estimated wait for housing assistance.

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

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

Because HUD requires the PHA to admit a specified percentage of extremely low-income families to the program (see Chapter 4, Part III), the PHA 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].

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

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

PHA outreach efforts must be designed to inform qualified families about the availability of 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

GHA Policy

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

Ongoing marketing of the Section 8 HCV program to those least likely to apply is a combined effort between the participating PHAs, MassNAHRO, and GoSection8. Publication of the initial participation in the Centralized Waiting List is the responsibility of the PHA. GoSection8 maintains an up-to-date website, which includes the following information:

- A description of the Centralized Waiting List and how it operates;
- A list of participating PHAs;
- Instructions about how to apply;
- Program eligibility information;
- The online Preliminary Application and printable paper Preliminary Application, which is available in multiple languages;
- The manner in which to perform a status check and modify a Preliminary Application, and responses to Frequently Asked Questions.

GoSection 8 also performs outreach and education to advocates and community service agencies by providing free training sessions about the application process. This includes providing informational postcards about the application process and how to obtain additional information. GoSection8 also provides toll-free live telephone support.

Individual PHAs and/or other parties as applicable may also perform marketing on an as-needed basis with regard to their specific programs. The GHA will provide a link to the Centralized Waiting List on its web site.

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

GHA Policy

Applicants on the Centralized Waiting List must inform the GHA of changes in contact information (including current residence, mailing address, and phone number), household composition, preferences, and total household income within 10 business days of the change. The change(s) must be submitted in writing to a PHA participating in the Centralized Waiting List, or online via the GoSection 8 application portal.

GoSection 8 will send email reminders to applicants, informing them of their obligation to keep their mailing address up to date. Applicants may also elect to receive optional text reminders.

In the event of a family break-up into two otherwise eligible families, only one family will retain the original Preliminary Application. The second family may submit a new Preliminary Application for assistance, which will have a new date and time.

In the absence of a judicial determination regarding who should retain the original application, the family will generally determine who retains the original Preliminary Application. The GHA will allow the head of household to report who remains on the original Preliminary Application to reflect this family decision. However, if MassNAHRO or the GHA is informed that the matter is in dispute, they shall make the decision about who will retain the original Preliminary Application, taking into consideration the following factors:

1. The interest of minor children, including custody arrangements;
2. The interest of ill, elderly, or disabled family members;
3. The interest of a victim of an occurrence of domestic violence, dating violence, sexual assault, or stalking³;
4. The relevant recommendations of social service professionals involved with the family; and
5. The head of household listed on the original application.

³ To the extent that the provisions set forth in 24 CFR, Part 5, Subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking apply, the PHA will adhere to such requirements.

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

HUD requires the PHA 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 a PHA request for information or updates, and the PHA determines that the family did not respond because of the family member's disability, the PHA must reinstate the applicant family to their former position on the waiting list [24 CFR 982.204(c)(2)].

PHA Policy

On a biennial basis, MassNAHRO will send a letter to each applicant on the Centralized Waiting List. This letter will be sent to the address on the Preliminary Application, or on any written change of status request that was completed and sent to a participating PHA. Applicants will be asked to respond to the mailing, either online at www.gosection8.com/MassCWL, or by mailing back the response card by the deadline provided in the letter. The letter will indicate that failure to respond will result in removal of the applicant's name from the Centralized Waiting List. If the applicant does not respond by the deadline, the applicant's name will be removed from the Centralized Waiting List.

Applicants removed by MassNAHRO for failing to respond to the update mailing may appeal to MassNAHRO during the posted reinstatement period. MassNAHRO will consider appeals filed after the reinstatement period if requested as a reasonable accommodation for a person with a disability.

Jurisdiction Regarding Certain Decisions:

If an applicant disagrees with a decision made by a PHA involved in the Centralized Waiting List, the applicant will be referred to the PHA that made the determination in question. This includes applicants who are removed from the Centralized Waiting List for failing to respond to the PHA.

If an applicant disagrees with a decision made by MassNAHRO, the applicant will be instructed to send a written request for reinstatement along with supporting documentation to MassNAHRO's Centralized Waiting List Administrator at: Massachusetts Centralized Waiting List, PO Box 308, Dedham, MA 02027.

Removal from the Waiting List

GHA Policy

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

If a family is removed from the waiting list because the GHA 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 Preliminary 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 the GHA's decision (see Chapter 16) [24 CFR 982.201(f)].

Removal from the Waiting List will not occur until the appeal process (when requested) has ended, or the time period for the family to request an appeal has expired.

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

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 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 these cases, the PHA may admit such families whether or not they are on the waiting list, and, if they are on the waiting list, without considering the family's position on the waiting list. These families are considered non-waiting list selections. The PHA must maintain records showing that such families were admitted with special program funding.

Targeted Funding [24 CFR 982.204(e)]

HUD may award a PHA funding for a specified category of families on the waiting list. The PHA must use this funding only to assist the families within the specified category. In order to assist families within a targeted funding category, the PHA may skip families that do not qualify within the targeted funding 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.

GHA Policy

A. Mainstream Vouchers:

In November 2019 and May 2020, the GHA was awarded eleven (11) Mainstream vouchers under HUD's NOFA FR-6300-N-43. (also formerly known as Mainstream 5-Year Vouchers or Section 811 Vouchers)

Housing Choice vouchers awarded under this NOFA are subject to the same program requirements covered under 24 CFR 982, as well as GHA's policies and procedures covered in the Administrative Plan.

Mainstream vouchers serve families that include a person with a disability who is at least 18 years old and not yet 62 years of age at the date of admission to the program.

To qualify for a Mainstream voucher from the GHA families also must be currently experiencing homelessness and transitioning out of an institutional or segregated setting.

Applicants must apply directly to the Section 8 Centralized Wait List for the Mainstream program. In order to be selected from the Centralized Waiting List for the Mainstream program, applicants must indicate that they qualify for the program as described above.

Applicants will be required to verify their disability and their housing status when they are selected from the waiting list. Applicants for the Mainstream program must also meet all other Section 8 eligibility criteria and local preference(s)

Mainstream Vouchers follow all Housing Choice Voucher rules and regulations in the GHA Administrative Plan.

Program Definitions:

Eligible household: A family composed of one or more non-elderly person with disabilities, which may include additional members who are not non-elderly persons with disabilities. A family where the sole member is an emancipated minor is not an eligible family. The terms "disability" and "person with disabilities" are used in two contexts - for civil rights protections and for program eligibility purposes. Each use has specific definitions. When used in the context of application of Federal civil rights laws and requirements, including the prohibition against discrimination, the civil rights related definitions apply. When used in the context of eligibility under this NOFA, the program eligibility definitions apply.

Non-elderly person with a disability (for purposes of determining eligibility): A person 18 years of age or older and less than 62 years of age, and who:

- Has a disability, as defined in 42 U.S.C. 423;
- Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:
- Is expected to be of long continued and indefinite duration;
- Substantially impedes his or her ability to live independently, and
- Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or
- Has a developmental disability as defined in 42 U.S.C. 6001.

Persons currently experiencing homelessness means:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- 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;
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or

- An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

- The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- 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; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime

residence or has made the individual or family afraid to return to their primary nighttime residence;

- Has no other residence; and
- Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

Institutional or other segregated settings include, but are not limited to:

- (1) congregate settings populated exclusively or primarily with individuals with disabilities;
- (2) congregate settings characterized by regimentation in daily activities, lack of privacy or autonomy, policies limiting visitors, or limits on individuals' ability to engage freely in community activities and to manage their own activities of daily living; or
- (3) settings that provide for daytime activities primarily with other individuals with disabilities.

Limited Preferences for Mainstream Vouchers: Applicants with the following housing status will be ranked co-equally for a preference:

- Currently experiencing homelessness; or
- Transitioning out of institutional or other segregated settings

The limited Mainstream voucher targeted funding preferences will be capped at 11 vouchers. Once 11 vouchers have been successfully leased, the preference will expire.

Upon turnover, all Mainstream vouchers must be re-issued to the next Mainstream-eligible family on the Centralized Waiting List. Turnover occurs when a family receiving Mainstream voucher assistance leaves the program. A Mainstream-eligible family includes a person with a disability who is at least 18 years old not yet 62 years old at the date of admission to the program.

The Mainstream voucher preference will be combined with the local area resident preference as described in 4-III.C.

Partnerships and Supportive Services:

The 2019 Mainstream NOFA encouraged PHA's to establish partnerships with a variety of organizations that assist persons with disabilities to help ensure applicants and participants find and maintain stable housing.

The GHA has established a network of services to aid Mainstream program applicants and participants in their search for housing and to maintain their tenancies. These services include referrals (with the household's consent) to agencies within the Franklin County area that offer support with housing search assistance and advocacy services for persons with disabilities.

The GHA will not require applicants or participants to utilize supportive services as a condition of participation in the Mainstream program. Individuals can receive services from any provider of their choosing or choose not to participate in any services. Moreover, the GHA will not limit vouchers only to those referred or approved by a social services or partner agency. Applicants must apply directly to the Centralized Waiting List if they have not already done so. The GHA will not give a preference to applicants who are directly referred by a social service or partner agency.

The GHA has established informal relationships with the following agencies to coordinate outreach and referral of eligible applicants and to provide housing stabilization services:

Three County Continuum of Care
Community Action Pioneer Valley
393 Main Street
Greenfield MA 01301
413-774-2318

Life Path
101 Munson Street
Greenfield MA 01301
413-773-5555

Housing Status will be verified as followed:

Currently Experiencing Homelessness: Submission of a Certificate of Homelessness form completed by an appropriate source. This includes public or private facilities that provide shelter to the homeless, the local police departments, a medical provider, or a social services agency. In addition, a signed statement from the applicant indicating:

- The applicant lacks a fixed, regular, or adequate nighttime residence; or
- The applicant's primary nighttime residence is a supervised public or private shelter designed to provide temporary housing; or
- The applicant's primary nighttime residence is a public or private place not designed for use as a regular sleeping place for human beings.

For individuals exiting an institution under this category: Submission or discharge paperwork from the institution or a written referral from a social service agency or medical provider indication that the applicant is exiting an institution where he/she/they resided for 90 days or less, and a Certificate of Homelessness form completed by an appropriate source, indicating the applicant was homeless immediately before entering the institution. The Certificate form must be completed by public or private facility that provide shelter to the homeless, the local police department, a medical provider, or a social service agency.

Transitioning Out of Institutional or Other Segregated Settings: For applicants transitioning out of institutional or other segregated settings, submission of discharge

paperwork from the institution or a written referral from a social services agency or medical provider indicating that the applicant is transitioning out of an institution or other segregated setting where he/she/they have resided.

Mainstream Voucher Preference:

A Mainstream Program Applicant will be required to verify their disability and their homeless status when they are called in for an eligibility interview. The GHA's Certification of Housing Status Form will require that an independent third party verify the applicant's housing status. This includes public or private facilities that provide shelter for homeless individuals and families, local police departments, or social service agencies. Applicants for the Mainstream program must also meet all other Section 8 eligibility criteria. After all eligibility requirements for the Section 8 program and the Mainstream Program have been satisfied, an eligible applicant will be issued a voucher, attend a briefing session and with the household's consent, referred to a Mainstream supportive service partner for housing assistance. To verify a family member's disability as defined in Section 4-III-B, the GHA will follow the verification procedures outlined in Section 7-II-F of this Plan.

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.

4-III.C. SELECTION METHOD

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

GHA Policy

Except for special admissions (see 24 CFR 982.203 (2018)), HCV participants will be selected from the Centralized Waiting List. GHA will select applicants from the Centralized Waiting List by date of application, applying any local preferences described below, or as required by HUD targeting requirements.

If HUD awards GHA program funding for a specified category of families on the Waiting List (see 24 CFR 982.204 e (2018)), GHA must select applicant families in the specified category for that program funding. This will be further described within this Plan, if applicable, the HUD award, and/or Notice of Funding Availability for said funding.

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

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

GHA Policy

The GHA will offer a local preference to:

- (1) any family that lives or works in the City of Greenfield, MA; or
- (2) any family that has been terminated from GHA's HCV program due to insufficient program funding.

All other applicants will be selected based on the date of application.

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

HUD requires that extremely low-income (ELI) families make up at least 75 percent of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher. To ensure this requirement is met, a PHA 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)].

GHA Policy

The GHA will monitor progress in meeting the income targeting requirement throughout the fiscal year. Extremely low-income (ELO) families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met. For audit purposes, the GHA will document the out-of-order selection of an ELO family in the file of the ELO-income family selected.

Order of Selection

The PHA system of preferences may select families based on local preferences according to the date and time of application or by a random selection process (lottery) [24 CFR 982.207(c)]. If a PHA does not have enough funding to assist the family at the top of the waiting list, it 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)].

GHA Policy

Families will be selected from the Centralized Waiting List based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the GHA'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 the GHA. Documentation will be maintained by the GHA 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 the GHA does not have to ask higher placed families each time targeted selections are made.

4-III.D. NOTIFICATION OF SELECTION

When a family has been selected from the waiting list, the PHA must notify the family [24 CFR 982.554(a)].

PHA Policy

The PHA 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

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

If a notification letter is returned to the PHA with no forwarding address, or if the family does not respond to the letter, the family will be removed from the Centralized Waiting List for GHA only. 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.

The GHA will not remove the family's name from the entire Centralized Waiting List. However, the GHA will not select the family again unless the family submits a new Preliminary Application to the GHA.

4-III.E. THE APPLICATION INTERVIEW

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a face-to-face interview with a PHA representative [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 the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA [Notice PIH 2018-24].

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

GHA 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 the GHA.

The head of household or spouse/cohead must provide acceptable 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 at the time of the interview, he or she will be required to provide it within 10 business days.

Pending disclosure and documentation of social security numbers, the GHA will allow the family to retain its place on the waiting list for **30 days**. If not all household members have disclosed their SSNs at the next time the GHA is issuing vouchers, the GHA 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, and must complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the GHA 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 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.

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

If notice of the interview sent to the family will state that if the family is unable to attend a scheduled interview, the family must contact the GHA in advance of the interview to schedule a new appointment, and that failure to attend the interview (or schedule a new interview) will result in the family being determined ineligible and denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial, including a statement of the family's right to an Informal Conference, will be issued in accordance with policies contained in Chapter 3.

4-III.F. COMPLETING THE APPLICATION PROCESS

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

GHA Policy

If the GHA determines that the family is ineligible, the GHA 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. The GHA will notify the family in writing that it has been returned to the waiting list, and will specify the reasons for it.

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