Chapter 4

APPLICATIONS, WAITING LIST AND TENANT SELECTION

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

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

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

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

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

4-I.A. OVERVIEW
This part describes the policies that guide the DMMHA’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.

4-I.B. APPLYING FOR ASSISTANCE
Any family that wishes to reside in public housing must apply for admission to the program [24 CFR 1.4(b) (2) (ii), 24 CFR 960.202(a) (2) (IV)]. HUD permits the DMMHA to determine the format and content of its applications, as well how such applications will be made available to interested families and how applications will be accepted by the DMMHA.

Pre-Application
All interested applicants will be required to complete a pre-application. In instances of disabled or other special needs applicants, coordination with appropriate agencies may be arranged.

Families may obtain pre-application forms from the DMMHA’s office during normal business hours or download and print an application from the City of Des Moines web-site at www.dmgov.org under the Housing Services Department tab. Families may also request – by telephone or by mail – that a pre-application be sent to the family via first class mail. DMMHA has also implemented a web based public housing pre-application process and interested families may now submit an on-line pre-application by visiting DMMHA.apply4housing.com.

Completed pre-applications must be returned to the DMMHA by mail, by fax, or submitted in person during normal business hours or submitted through DMMHA’s web based service. Pre-applications must be complete in order to be accepted by the DMMHA for processing. If a paper pre-application is incomplete, the DMMHA will return the paper pre-application to the family, notify the family the pre-application cannot be processed, and notify the family of the additional information required. The on-line web based pre-application service will not accept incomplete pre-applications.

Applicants will be placed on the waiting list based on information provided on the pre-application. When staff estimates that a unit will be available within the next several months, applicants will be required to attend an interview and complete a formal application for housing.

Formal Full Application
As applicants approach the top of the waiting list, and/or at the time applicants are offered housing, the DMMHA will do a complete verification of eligibility.

The family will be notified by mail of the date and time of the appointment.

All family members eighteen (18) years of age or older must appear for the scheduled appointment. If family has a husband and wife, both parties must be present regardless of age.

After having missed one scheduled appointment for the meeting to complete the formal application, the family's pre-application will be retired and their name removed from the waiting list.
list unless the family can verify a medical emergency kept them from attending the formal application appointment. However, if the applicant contacts the Agency prior to the scheduled formal application meeting, the Agency may reschedule the applicant. An applicant will be afforded no more than two (2) opportunities to request rescheduling the full application appointment.

All information regarding previous rental history and/or program participation, criminal background, gross family income, gross assets, and preference rating will be verified and maintained in the applicant's file.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

The DMMHA will take a variety of steps to reasonably accommodate accessibility to the application process for those people who might have difficulty complying with the standard DMMHA application process.

Disabled Populations

Chapter 2 provides a full discussion of the DMMHA’s policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

Chapter 2 provides a full discussion on the DMMHA’s policies related to providing access to people with limited English proficiency (LEP).

4-I.D. PLACEMENT ON THE WAITING LIST

Acceptance of pre-applications will occur only during publicly announced time periods during which all interested persons may apply for admission to the DMMHA's Public Housing program.

Applicants will be assigned to the site-based waiting list(s) based on preferences, site choice, occupancy standards, and the date and time of application.

Applicants will be placed on the largest occupancy waiting list that they are eligible for based on the DMMHA Occupancy Standards outlined in Chapter 5 of this Policy.

Placement on the waiting list does not indicate that the family is eligible for admission. When the family is selected from the waiting list to complete the formal application, the DMMHA will verify any preference(s) claimed (if not already done so) and determine eligibility and suitability for admission to the program.
PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The DMMHA is required to have policies in the ACOP regarding the type of waiting list it will utilize as well as the 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 public housing, and conducting outreach to ensure a sufficient number of applicants.

4-II.B. ORGANIZATION OF THE WAITING LIST

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

The DMMHA will maintain a site based waiting list system, with separate waiting lists for each of the following sites within the DMMHA’s public housing stock:

Royal View Manor Site
Eastview Manor Site
Highland Park Plaza Site
Oak Park Plaza Site
Southview Manor Site
Scattered Properties Site

Applicants must choose at least one site based waiting list upon which they wish to be placed. Pre-applications in which no site has been selected will be returned to the applicant for completion.

DMMHA will monitor the site-based waiting Lists based on regulations cited in 24CFR 903.7(2) (v) (as amended).

The applicant may make a written request to change the site waiting list they have selected. In the event that the applicant pool for a particular site is minimal, the DMMHA may offer said site to eligible applicants on the other site lists. Refusal by an applicant of the alternate site will not result in removal from the waiting list for their preferred site.

In the event that an applicant selects a site in which there are no units to accommodate the bedroom size the applicant qualifies for (e.g. applicant qualifies for a 1 bedroom but there are no 1-bedroom units in the site they chose, the DMMHA will place the applicant on all site lists that have units that accommodate the bedroom size the applicant qualifies for.
4-II.C. OPENING AND CLOSING THE WAITING LIST

Closing the Waiting List

The DMMHA may close the waiting list, in whole or in part, if it has an adequate pool of families to fully lease units in all of its developments. The DMMHA may close the waiting list completely, or restrict intake by preference, type of project, site, or by size and type of dwelling unit.

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

Reopening the Waiting List

If the waiting list has been closed, it may be reopened by the DMMHA at its sole discretion at any time. The DMMHA will publish a notice announcing the reopening of the waiting list in suitable media outlets, including local newspapers of general circulation, media directed toward minority populations, local service providers, City of Des Moines website, Polk County Housing Continuum and other suitable media outlets. Such notice must comply with HUD fair housing requirements. The DMMHA will specify who may apply, and where, when and how applications will be received.

The DMMHA will announce the reopening of the waiting list at least 30 calendar days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.

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

DMMHA will monitor the characteristics of the populations being served and the characteristics of the population as a whole in the DMMHA’s jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved. Marketing strategies will be on-going to inform all associated groups or individuals that DMMHA will be attempting to reach and serve. All outreach methods will be evaluated as to their necessity and/or effectiveness. Various outreach methods will be brought into play if it is determined that a segment or segments of the community are not being reached or that the number of very low-income families have not been admitted into the Public Housing Program as required by HUD. A detailed plan of outreach is outlined in the Agency’s Marketing Plan (Exhibit 4-1).

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

While the family is on the waiting list, the family must inform the DMMHA, of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number, within 14 calendar days of the change occurring. The changes must be submitted in writing.

Families will be advised to notify the Application Specialist, in writing, if the family’s address changes. Failure to properly notify the DMMHA of a new address will result in the family being removed from the waiting list. Cases in which the family’s mail is returned from the post office and information has been provided of a guardian or a service provider for the family, the DMMHA
will contact the guardian or the service provider and ask that it submit, in writing, a new address for the family. In the event that DMMHA does not receive a response or new address for the family, the family will be removed from the waiting list without further notice. In cases in which DMMHA has not been provided a current mailing address, no Informal Review will be offered. Such failure to act on the part of the applicant prevents the DMMHA from making an eligibility determination; therefore, no Informal Review is required.

Changes in an applicant's circumstances while on the waiting list may affect the family's qualification for a particular bedroom size or entitlement to a preference. When an applicant reports a change that affects their placement on the waiting list, the waiting list will be updated accordingly.

Any applicant knowingly providing false information or fraudulent statements or withholding complete information affecting the applicant's status or eligibility for housing, will be removed from the waiting list.

4-II.F. UPDATING THE WAITING LIST

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

Purging the Waiting List

The pool of active applicants will be kept current by requiring each applicant to inform the Housing Agency at least once annually of continued interest. The DMMHA will send an update letter to the applicant requiring the applicant to submit a form indicating continued interest and any updated information, such as change of address or household information. Failure of an applicant to respond to a delivered update letter will result in the applicant being removed from the waiting list.

Except as otherwise provided in this paragraph, if the update letter is returned by the post office, the applicant will be removed from the waiting list without further notice. In cases where the family’s update letter is returned from the post office and information has been provided of a guardian or service provider for the family, the DMMHA will not immediately remove the application from the waiting list. In these instances, the DMMHA will contact the guardian or the service provider and ask that it submit, in writing, a new address for the family. In the event that DMMHA does not receive a response or new address for the family, the family will be removed from the waiting list.

When a family is removed from the waiting list during the waiting list purge update process for failure to respond, no Informal Review will be offered. Such failures to act on the part of the applicant prevent the DMMHA from making an eligibility determination; therefore, no Informal Review is required.
Removal from the Waiting List

An applicant may withdraw their pre-application at any time in writing. A withdrawn pre-application cannot be reactivated and the applicant who has withdrawn their pre-application shall be required to reapply when the waiting list is opened.

If the DMMHA determines that the family is not eligible for admission (see Chapter 3) at any time while the family is on the waiting list the family will be removed from the waiting list.

If a family is removed from the waiting list because the DMMHA has determined the family is not eligible for admission, a notice will be sent to the family’s address of record. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the DMMHA’s decision (see Chapter 14) [24 CFR 960.208(a)].

The DMMHA may deny the processing of a pre-application for an individual or family who was denied Public Housing within six (6) months prior to the date of denial of the pre-application.
PART III: TENANT SELECTION

4-III.A. OVERVIEW

The DMMHA has established tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)].

The DMMHA will maintain a complete record of all information required to verify that the family is selected from the waiting list according to the DMMHA’s selection policies [24 CFR 960.206(e)(2)]. The DMMHA’s policies will be available for public review in the DMMHA Administrative office. The DMMHA will provide a copy of its tenant selection policies upon request by any applicant or tenant in accordance with the City of Des Moines fees for copies policy.

4-III.B. SELECTION METHOD

Preferences [24 CFR 960.206]

DMMHA gives a higher priority to applicants who are currently eligible for one or more preferences. Families qualifying for three preferences will be considered first, families qualifying for two preferences second, then families qualifying for any one of the preferences. After preferences, DMMHA will determine priority based upon the date and time of application. The preferences are listed below. A family must provide acceptable verification that they are eligible for a preference. Acceptable verification must come from a government agency, law enforcement agency, public or private shelter, clergy, employer, educational facility administrator, or social service agency. Adequacy of the verification shall be determined by the DMMHA in its sole discretion. The verification is valid for ninety (90) days. If the applicant is not housed within ninety (90) days, the preference may be re-verified at the time the family is offered assistance.

Preferences will be verified on prescribed forms and are defined below.

Emergency Preference

1. **As a result of Actual Physical Violence** – violence directed against the applicant or one or more members of the applicant’s family by a spouse or other member of the applicant's household; or, the applicant lives in a housing unit with such an individual who engages in such violence (police reports substantiating the violence will be required as verification that such violence has occurred in the applicant’s household). Further, the individual who engages in such violent activity will NOT be allowed to reside with the applicant in the Public Housing Program housing unless DMMHA provides written approval. The DMMHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who are seeking an emergency transfer under VAWA.

2. **As a Result of Hate Crimes** – If one of more of the applicant’s family have been the victim of one or more alleged hate crimes; and the applicant has vacated a housing unit because of such alleged crime, or the fear associated with such alleged crime has destroyed the applicant’s peaceful enjoyment of the unit (police reports substantiating the alleged crime will be required as verification).
3. **As a Result of a Natural Disaster or Casualty** – An applicant who is a victim of a natural disaster or casualty may qualify for this preference upon verification that the natural disaster or casualty occurred and that the natural disaster casualty was beyond the applicants’ ability to control and rendered the housing unit unusable. In the event of a fire in a unit, verification from the Fire Marshall that the fire occurred as a result of natural causes, and not as the result of tenant neglect, will be required in order to qualify for this preference.

4. **As a Result of Involuntary Displacement** – An applicant is displaced as a tenant as a result of an action by the owner of a housing unit as listed below:
   a) The reason for the owner's action is beyond the tenant's ability to control and is not the fault of tenant; (DMMHA requires verification of this by the landlord, property owner, property management group, or social service agency that is assisting in finding replacement housing.)
   b) The action is occurring despite the tenant meeting all previously imposed conditions of occupancy;
   c) The action taken is other than a rent increase or an eviction notice for violation of lease.

**Working Preference**
Preference will be given to applicants in which the head, spouse, or sole member is employed at least twenty-five (25) hours per week (so long as DMMHA Income Targeting requirements are not negatively affected).

Written verification from the employer will be required as documentation to support the applicant’s eligibility for this preference.

This preference is automatically extended to an applicant family if the head and spouse, or sole member is age 62 or older, or is a person with a disability.

**Certification and Verification of Preference Qualification:**

1. At the time of pre-application, information about the preference categories and a certification form will be made available to each applicant.

2. Applicants wishing to apply for a preference will be required to complete the Agency’s preference forms and supply all required documentation needed to verify such preference.

3. When the applicant is called in for a formal application interview to determine eligibility, the applicant’s preference qualifications may be re-verified if the preference verification documentation is over ninety (90) calendar days old. If qualification for preference cannot be verified, the application will be returned to the waiting list according to the original date and time of the pre-application, but without preference status.
4. If it is determined that an applicant does not meet the criteria to qualify for preference status, the DMMHA shall provide written notice of that determination stating the reason of the determination and informing the applicant of his/her right to request an Informal Review with a representative of the DMMHA. Requests to review a denial of preference status must be made within ten (10) business days of the date stated on the written notice informing the applicant of the denial.

5. Generally, preference verification will be valid for ninety (90) calendar days. If the applicant is not housed within ninety (90) calendar days, the preference(s) may be re-verified at the time the family is offered housing assistance. However, DMMHA reserves the right to re-verify a preference at any time throughout the application process.

Income Targeting [24 CFR 960.202(b)]

DMMHA will monitor progress in meeting HUD’s Extremely Low Income (ELI) requirement throughout the fiscal year. ELI families will be selected ahead of other eligible families or on an as needed basis to ensure that the income targeting requirement is met.

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

The DMMHA has designated public housing projects specifically for elderly families. The DMMHA has a HUD-approved allocation plan.

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

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

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

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

The DMMHA will notify the family by first class mail at the most recently provided address when they are selected from the waiting list to attend the formal application interview. [24 CFR 960.208]

The notice will inform the family of the following:

- Date, time, and location of the scheduled formal 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

Except as otherwise provided in this paragraph, if a notification letter is returned to the DMMHA by the post office, the family will be removed from the waiting list without further notice. In cases where the family’s notification letter is returned from the post office and information has been provided of guardian or a service provider for the family, the DMMHA will not immediately retire the application from the waiting list. In these instances, the DMMHA will contact the guardian or the service provider and ask that it submit, in writing, a new address for the family. In the event that DMMHA does not receive a response or new address for the family, the family will be removed from the waiting list. Such failure to provide a current address by the applicant family prevents the DMMHA from making an eligibility determination; therefore, no informal hearing will be offered.

Transitional Housing Program Participants

In the event that an applicant is selected from the waiting list and the applicant notifies the DMMHA that he/she is a participant in a recognized transitional housing program, the DMMHA may, at its sole discretion, allow the applicant to hold its current position on the waiting list while completing the approved program subject to the requirements of this section.

1. The DMMHA will require the applicant to submit written verification of participation in the program and the approximate date of completion of the program prior to holding the applicant’s position on the waiting list.

2. Upon receipt of the required verification, the DMMHA will notify the applicant, in writing, of its decision to approve or deny the request to hold its position on the waiting list until participation in the approved program is completed.

3. An applicant who is approved to hold its position on the waiting list must inform DMMHA when it has completed the approved program. Upon written notification from the applicant that the approved program has been completed, the DMMHA will begin processing the pre-application in accordance with the policies set forth in this plan.
4. Applicants who are approved to hold their position on the waiting list must comply with the same requirements as all other Public Housing applicants, including but not limited to, supplying any information that is required and submitting address changes in writing. Such applicants that do not respond within the required timeframe or have correspondence that is returned by the post office or otherwise respond will be removed from the waiting list.

4-III.D. THE FORMAL APPLICATION INTERVIEW

Families selected from the waiting list are required to participate in a formal application update interview. Being invited to attend an application interview does not constitute admission to the program.

All family members over eighteen (18) years of age must appear for the update interview and are encouraged to attend the update interview together. If all adult family members cannot attend at the same time, the adult members that could not attend will be asked to schedule an appointment to sign all required documents.

Pending disclosure and documentation of social security numbers (SSNs), the DMMHA will allow the family to retain its place on the waiting list for ninety (90) calendar days. If not, all family members have disclosed their SSNs prior to the next time a unit becomes available, the DMMHA will offer the unit to the next eligible applicant family on the waiting list. If not, all family members have disclosed their SSNs within the ninety (90) calendar days, the applicant will be retired/removed from the waiting list.

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

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

Any required documents or information that the family is unable to provide at the interview must be provided within 14 calendar 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 granted extensions), the family will be retired/removed from the waiting list. Such failure to act on the part of the applicant prevents the DMMHA from making an eligibility determination; therefore, the DMMHA will not offer an Informal Review.
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 DMMHA will provide translation services in accordance with the DMMHA’s LEP plan.

If the family is unable to attend a scheduled interview, the family shall contact the DMMHA in advance of the interview to schedule a new appointment. Applicants who fail to attend the scheduled interview without DMMHA approval of reschedule, will have their applications retired, without further notice, based on the family’s failure to supply information needed to determine eligibility. Such failure to act on the part of the applicant prevents the DMMHA from making an eligibility determination; therefore, the DMMHA will not offer an Informal Review.

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

Based on verified information related to the eligibility requirements, including DMMHA suitability standards, the DMMHA will make a final determination of applicant eligibility (see Chapter 3).

Applicants determined to be ineligible for housing at the DMMHA will be promptly notified and will receive a Notice of Ineligibility from DMMHA stating the basis for this determination. The DMMHA will provide such applicants with the opportunity for Informal Review of the decision in accordance with the HUD regulations and the procedure for Informal Review (See Chapter 14 for DMMHA policies regarding Informal Reviews). The DMMHA will maintain files of all ineligible applications for at least three (3) years, including documentation stating the reason(s) for the ineligibility.

Applicants determined to be qualified for housing at the DMMHA will be notified in writing by DMMHA of the approximate date of unit availability insofar as that date can be reasonably determined. Every effort will be made by DMMHA Agency to make as accurate an estimate on availability as possible; however, the applicant shall not rely upon such estimate with an expectation to be housed by the estimated date as the availability of a suitable unit may be contingent on factors not controlled by the DMMHA.

If, during the final eligibility determination, or any other time prior to placement, it is determined that the family composition has changed, making the family eligible for a different size unit, the family's pre-application shall be placed on the waiting list for the new unit size based on the original date of the family's pre-application.

The DMMHA must provide the family a notice of VAWA rights (form HUD-5380) as well as the HUD VAWA self-certification form (form HUD-5382) in accordance with the Violence Against Women Act of 2013, and as outlined in 16-V.L.C, at the time the applicant is provided assistance or at the time the applicant is denied assistance. This notice must be provided in both of the following instances; (1) when a family begins receiving assistance (lease execution); or (2) when a family is notified of its ineligibility.