Chapter 4
APPLICATIONS, WAITING LIST AND TENANT SELECTION
PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW
This part describes the policies that guide COC’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 COC’s obligation to ensure the accessibility of the application process.

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). However, COC must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of COC’s application.

COC Policy

Depending upon the length of time that applicants may need to wait to be housed, COC 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 90 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and the amount of rent the family will pay.

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 90 days from the date of application. Under the two-step application process, COC 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 the amount of rent the family will pay when selected from the waiting list.

Families may obtain application forms from COC’s office during normal business hours or from the website. Families may also request – by telephone, email or by mail – that a form be sent to the family via first class mail.

Completed applications must be returned to COC by mail, or submitted in person during normal business hours. Applications must be complete in order to be accepted by COC for processing. If an application is incomplete, COC will notify the family of the additional information required.
4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

COC must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard COC application process.

Disabled Populations [24 CFR 8]

COC must provide reasonable accommodation to the needs of individuals with disabilities. The application-taking facility and the application process must be fully accessible, or COC must provide an alternate approach that provides equal access to the application process. Chapter 2 provides a full discussion of COC’s policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

COC 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 COC’s policies related to ensuring access to people with limited English proficiency (LEP).
4-I.D. PLACEMENT ON THE WAITING LIST

Ineligible for Placement on the Waiting List

COC Policy

If COC 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, COC will send written notification of the ineligibility determination within 10 business days of receiving a completed application. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing and explain the process for doing so (see Chapter 14).

Eligible for Placement on the Waiting List

COC Policy

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

Applicants will be placed on the waiting list according to COC preference(s) and the date and time their complete application is received by COC. (State properties & Federal elderly)

When the lottery system is used, applicants will be placed on the waiting list according to COC preference(s) and a lottery system. Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers within their respective preference categories. (Federal Family properties)

COC will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards (see Chapter 5). Families may request to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines (as long as the unit is not overcrowded according to COC standards and local codes). However, in these cases, the family must agree not to request a transfer for two years after admission, unless they have a change in family size or composition.
PART II: MANAGING THE WAITING LIST

4-II.A. ORGANIZATION OF THE WAITING LIST

COC Policy

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

- Names of head and spouse
- Social security number of all members
- Street address and phone numbers
- Unit size required (number of family members)
- Amount and source of annual income
- Accessibility requirement, if any
- Date and time of application or application number
- Household type (family, elderly, disabled)
- Admission preference, if any
- Race and ethnicity of the head of household
- The specific site(s) selected (only if COC offers site-based waiting lists)
COC Policy

COC will maintain a site-based waiting list system, with separate waiting lists for each of the following properties:

**Elderly Developments:**
- Stamford Manor
- Rippowam Manor
- Glenbrook Manor

**Family Developments:**
- Connecticut Avenue
- Lawn Avenue Townhouses
- Ursula Park Townhouses
- Soundview Avenue
- Durant Street
- Sheridan Mews
- Oak Park
- Lawnhill Terrace

**Tax Credit Developments:**
- Clinton Manor
- Quintard Manor
- Taylor Street
- Post House
- Fairgate
- Westwood
- Palmer Square
- Greenfield
- Summer Place
- Lawnhill Terrace LP
- Park 215
HUD directs that a family that applies to reside in public housing must be offered the opportunity to be placed on the waiting list for any tenant-based or project-based voucher or moderate rehabilitation program that COC operates if 1) the other programs’ waiting lists are open, and 2) the family is qualified for the other programs [24 CFR 982.205(a)(2)(i)].

**COC Policy**

COC will not merge the public housing waiting list with the waiting list for any other program COC operates.

### 4-II.B. OPENING AND CLOSING THE WAITING LIST

#### Closing the Waiting List

**COC Policy**

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

COC will announce by public notice the closing of the waiting list only if the list remains open to certain categories of families, this information will be contained in the notice. The media outlets include, but not limited to:

- **Stamford Advocate**
- **Local community service providers**
- **Local Community Centers**
- **COC website**

#### Reopening the Waiting List

**COC Policy**

COC will announce the reopening of the waiting list at least 14 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. The notice will specify where, when, and how applications are to be received.

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

- **Stamford Advocate**
- **Local community service providers**
- **Local Community Centers**
- **COC website**
4-II.C. FAMILY OUTREACH [24 CFR 903.2(d); 24 CFR 903.7(a) and (b)]

COC Policy

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

4-II.D. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

COC Policy

While the family is on the waiting list, the family must inform COC, within 30 business days, of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

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.
4-II.E. UPDATING 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 the COC’s request for information or updates because of the family member’s disability, COC must, upon the family’s request, reinstate the applicant family to their former position on the waiting list as a reasonable accommodation [24 CFR 8.4(a), 24 CFR 100.204(a), and PH Occ GB, p. 39 and 40]. See Chapter 2 for further information regarding reasonable accommodations.

COC Policy

The waiting list will be updated at least annually to ensure that all applicants and applicant information is current and timely.

To update the waiting list, COC will send an update request via first class mail to each family on the waiting list 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 COC 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.

The family’s response must be in writing and may be delivered in person or by mail. Responses should be postmarked or received by COC no later than 15 business days from the date of the COC 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, the applicant will be removed from the waiting list without further notice.

When a family is removed from the waiting list during the update process for failure to respond, no informal hearing will be offered. Such failures to act on the part of the applicant prevent COC from making an eligibility determination; therefore no informal hearing is required.

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 COC error, or to circumstances beyond the family’s control.
Removal from the Waiting List

COC Policy

COC will remove applicants from the waiting list if they have requested that their name be removed. In such cases no informal hearing is required.

If COC 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 COC has determined the family is not eligible for admission, a notice will be sent to the family’s address of record provided on the 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 hearing regarding COC’s decision (see Chapter 14) [24 CFR 960.208(a)].
PART III: TENANT SELECTION

4-III.A. OVERVIEW

COC must establish tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)]. COC must not require any specific income or racial quotas for any developments [24 CFR 903.2(d)]. COC must not assign persons to a particular section of a community or to a development or building based on race, color, religion, sex, disability, familial status or national origin for purposes of segregating populations [24 CFR 1.4(b)(1)(iii) and 24 CFR 903.2(d)(1)].

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

COC must maintain a clear record of all information required to verify that the family is selected from the waiting list according to COC’s selection policies [24 CFR 960.206(e)(2)]. COC’s policies must be posted any place where COC receives applications. COC must provide a copy of its tenant selection policies upon request to any applicant or tenant. COC may charge the family for providing a copy of its tenant selection policies [24 CFR 960.202(c)(2)].

COC Policy

When an applicant or resident family requests a copy of COC’s tenant selection policies, COC will provide copies to them for .25 each.
4-III.B. SELECTION METHOD

COC must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that COC will use.

Local Preferences [24 CFR 960.206]

COC 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 COC to establish other local preferences, at its discretion. Any local preferences established must be consistent with the COC plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

COC Policy

COC will use the following local preference for the Federal Family and Housing Choice Voucher waiting list:

1. Involuntary Displacement preference: are applicants who have been involuntarily displaced and are not living in standard, permanent replacement housing, or will be involuntarily displaced within no more than six months from the date of verification by COC.

Families are considered to be involuntarily displaced if they are required to vacate housing as a result of one of the following situations.

- A disaster-fire, flood, earthquake, etc. that has caused the unit to be uninhabitable.
- Federal, state or local government action related to code enforcement, public improvement or development.
- Action by a housing owner in which is beyond an applicant’s ability to control, and which occurs despite the applicant’s having met all previous conditions of occupancy, and is other than a rent increase.

If the owner is an immediate family relative and there has been no previous rental agreement and the applicant has been part of the owner’s family immediately prior to application, the applicant will not be considered involuntarily displaced.

For purposes of this definition, reason for an applicant or resident having to vacate a housing unit include, but are not limited to:

- Conversion of an applicant’s housing unit to non-rental or non-residential use;
- Closure of an applicant’s housing unit for rehabilitation or non-residential use;
- Notice to an applicant that s/he must vacate a unit because the owner wants the unit for the owner’s personal or family use or occupancy;
• Sale of a housing unit in which an applicant resides under an agreement that the unit must be vacant when possession is transferred; or

• Any other legal authorized act that results, or will result, in the withdrawal by the owner of the unit or structure from the rental market.

2. **Hate Crime**: If a member of the family has been the victim of one or more hate crimes, and the applicant has vacated the unit because of the crime or the fear of such a crime has destroyed the applicant’s peaceful enjoyment of the unit.

   • A hate crime is actual or threatened physical violence or intimidation that is directed against a person or his property and is based on the person’s race, color, religion, sex, national origin, disability or familial status including sexual orientation, gender identity and marital status occurred within the last 90 days or is of a continuing nature.

   The family must be a part of a Witness Protection Program, or the HUD Office or law enforcement agency must have informed COC that the family is part of a similar program.

3. **VAWA**: COC will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who have either been referred by a partnering service agency or consortia or is seeking an emergency transfer under VAWA from Housing Choice Voucher program or other covered housing program operated by COC.

   COC will work with the following partnering service agencies:

   Domestic Violence Crisis Center

   The applicant must certify that the abuser will not reside with the applicant unless COC gives prior written approval.

   After 6 months, COC may require an update of the preference documents.

4. **Chronic Homelessness and Other Vulnerable Homeless Persons**

   COC will offer a chronic homelessness preference to any family that meets the HUD definition of chronic homelessness. If there are no chronic homeless families at the time of vacancy, the opportunity will be offered to the next most vulnerable homeless person in accordance with prioritization established by the Coordinated Access Network “CAN”. The family must be referred to COC by a homeless service provider through the CAN based on their vulnerability. Referring agencies must have an executed Memorandum of Understanding with COC in coordination with the Stamford Housing First Collaborative, outlining the provider's responsibility to provide services for the referred household.
The referral must include a commitment by the homeless service provider to provide housing search assistance and supportive services to help the household transition from homelessness to permanent housing, including complying with the Housing Choice Voucher program rules.

One of every five applicants selected from the wait list will be a chronically homeless applicant.

Income Targeting Requirement [24 CFR 960.202(b)]

HUD requires that extremely low-income (ELI) families make up at least 40 percent of the families admitted to public housing during COC’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 [Federal Register notice 6/25/14] To ensure this requirement is met, COC may skip non-ELI families on the waiting list in order to select an ELI family.

If COC also operates a housing choice voucher (HCV) program, admissions of extremely low-income families to COC’s HCV program during a COC fiscal year that exceed the 75 percent minimum target requirement for the voucher program, shall be credited against COC’s basic targeting requirement in the public housing program for the same fiscal year. However, under these circumstances the fiscal year credit to the public housing program must not exceed the lower of: (1) ten percent of public housing waiting list admissions during the COC fiscal year; (2) ten percent of waiting list admissions to COC’s housing choice voucher program during COC’s fiscal year; or (3) the number of qualifying low-income families who commence occupancy during the fiscal year of COC public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

COC Policy

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

A mixed population development is a public housing development or portion of a development that was reserved for elderly families and disabled families at its inception (and has retained that character) or COC at some point after its inception obtained HUD approval to give preference in tenant selection for all units in the development (or portion of a development) to elderly and disabled families [24 CFR 960.102].

Elderly family means a family whose head, spouse, cohead, or sole member is a person who is at least 62 years of age. Disabled family means a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403].

COC must give elderly and disabled families equal preference in selecting these families for admission to mixed population developments. COC may not establish a limit on the number of elderly or disabled families that may occupy a mixed population development. In selecting elderly and disabled families to fill these units, COC must first offer the units that have accessibility features for families that include a person with a disability and require the accessibility features of such units. COC may not discriminate against elderly or disabled families that include children (Fair Housing Amendments Act of 1988).

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

COC may designate projects or portions of a public housing project specifically for elderly or disabled families. COC must have a HUD-approved allocation plan before the designation may take place.

Among the designated developments, COC 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, COC may allow near-elderly families to occupy the units [24 CFR 945.303(c)(1)]. Near-elderly family means a family whose head, spouse, or cohead 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, COC must make available to all other families any unit that is ready for re-rental and has been vacant for more than 60 consecutive days [24 CFR 945.303(c)(2)].

The decision of any disabled family or elderly family not to occupy or accept occupancy in designated housing shall not have an adverse affect 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 or for disabled families, and requests occupancy in a general occupancy project or in a mixed population project [24 CFR 945.303(d)(3)].

COC Policy

COC does not have designated elderly or designated disabled housing at this time.
Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

COC's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of COC’s deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

COC’s deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as ‘covered developments’ and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by COC with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by COC with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

**COC Policy**

- COC will determine the average income of all families in all covered developments on an annual basis.
- COC will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

COC must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low income family (30% of median income).

With covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Where the income profile for a covered development is not explained or justified in the annual plan submission, COC must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances COC’s deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
• Establishing a preference for admission of working families in developments below the EIR
• Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
• Providing other strategies permitted by statute and determined by COC in consultation with the residents and the community through the annual plan process to be responsive to local needs and COC strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the COC's deconcentration policy. COC must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under COC’s deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, COC will be considered to be in compliance with the deconcentration requirement and no further action is required.

**COC Policy**

For developments outside the EIR the COC will take the following actions to provide for deconcentration of poverty and income mixing:

**Skipping a family on the waiting list or transfer list to reach another family in an effort to further the goals of COC’s deconcentration policy:**

If a unit becomes available at a development below the EIR, the first eligible family on the waiting list or transfer list with income above the EIR will be offered the unit. If that family refuses the unit, the next eligible family on the waiting list or transfer list with income above the EIR will be offered the unit. The process will continue in this order. For the available unit at the development below the EIR, if there is no family on the waiting list or transfer list with income over the EIR, or no family with income above the EIR accepts the offer, then the unit will be offered to the first eligible family on the waiting list or transfer list in preference order regardless of income.

If a unit becomes available at a development above the EIR, the first eligible family on the waiting list or transfer list with income below the EIR will be offered the unit. If that family refuses the unit, the next eligible family on the waiting list or transfer list with income below the EIR will be offered the unit. The process will continue in this order. For the available unit at the development above the EIR, if there is no family on the waiting list or transfer list with income below the EIR, or no family with income below the EIR accepts the offer, then the unit will be offered to the first eligible family on the waiting list or transfer list in preference order regardless of income.

Skipping of families for deconcentration purposes will be applied uniformly to all families.

A family has the sole discretion whether to accept an offer of a unit made under COC’s deconcentration policy. COC shall not take any adverse action
toward any eligible family for choosing no to accept an offer of a unit under COC’s deconcentration policy. However, COC shall uniformly limit the number of offers received by applicants and transfer families, described in this chapter.

COC shall establish a preference for admission of working families in covered developments below the EIR.

COC shall target investment and capital improvements toward covered developments below the EIR to encourage applicant families whose income is above the EIR to accept units in those developments.

COC shall offer incentives to families with incomes above the EIR willing to move into a development with average income below the EIR and/or to families with incomes below the EIR willing to move into a development with average income above the EIR.
Order of Selection [24 CFR 960.206(e)]

The COC system of preferences may select families either according to the date and time of application or by a lottery system.

**COC Policy**

**Lottery Method:**

Families may be selected from the waiting list based on selection preference(s) for which they qualify, and in accordance with COC’s hierarchy of those preferences. Within each preference category, families will be selected in numerical order based on the numbers that were assigned to each application, by lottery, at the time the applications were placed on the waiting list.

**First come/First served:**

Families may be selected from the waiting list based on preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by COC.

When selecting applicants from the waiting list, COC will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. COC will offer the unit to the highest ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentration or income mixing and income targeting will also be considered in accordance with HUD requirements and COC policy.
4-III.C. NOTIFICATION OF SELECTION

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

COC Policy

COC will notify the family by first class mail and/or by phone and/or by email when it is selected from the waiting list. If contacted by phone, a notice will be sent by first class mail to follow up.

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
- Documents that must be provided at the interview to document eligibility for a preference, if applicable
- Other documents and information that should be brought to the interview

If a notification letter is returned to COC, the family will be removed from the waiting list without further notice. Such failure to act on the part of the applicant prevents COC from making an eligibility determination; therefore no informal hearing will be offered.

If a notification letter is returned to COC, due to a COC error, the family will be reinstated on the waiting list.
4-III.D. THE APPLICATION INTERVIEW

COC Policy

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

All adult family members are required to attend the interview.

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, COC will allow the family to retain its place on the waiting list for 90 days. If not all household members have disclosed their SSNs at the next time a unit becomes available, COC will offer a unit to the next eligible applicant family on 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 Chapter 7). If the family is verified as eligible for the preference, COC will proceed with the interview. If COC 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 their 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, COC will provide the family with a written list of items that must be submitted.

If full application is completed for eligibility, no interview will be held.
Any required documents or information that the family is unable to provide at the interview must be provided within 5 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.

Interviews will be conducted in English.

If the family is unable to attend a scheduled interview, the family should contact COC 48 hours in advance of the interview to schedule a new appointment.

Applicants who fail to attend two scheduled interviews without COC approval will have their applications made inactive based on the family’s failure to supply information needed to determine eligibility and the family will be removed from the waiting list without further notice.

The appointment letters will state that failure to appear for the appointment without a request to reschedule will be interpreted to mean that the family is no longer interested and their application will be made inactive. Such failure to act on the part of the applicant prevents COC from making an eligibility determination; therefore COC will not offer an informal hearing.
4-III.E. FINAL ELIGIBILITY DETERMINATION [24 CFR 960.208]

COC must verify all information provided by the family (see Chapter 7). Based on verified information related to the eligibility requirements, including COC suitability standards, COC must make a final determination of eligibility (see Chapter 3).

When a determination is made that a family is eligible and satisfies all requirements for admission, including tenant selection criteria, the applicant must be notified of the approximate date of occupancy insofar as that date can be reasonably determined [24 CFR 960.208(b)].

COC Policy

COC will notify a family in writing of their eligibility within 10 business days of the determination after interview with an approximate date of occupancy insofar as that date can be reasonably determined.

COC will expedite the administrative process for determining eligibility to the extent possible for applicants who are admitted to the public housing program as a result of an emergency transfer from another COC program.

COC must promptly notify any family determined to be ineligible for admission of the basis for such determination, and must provide the applicant upon request, within a reasonable time after the determination is made, with an opportunity for an informal hearing on such determination [24 CFR 960.208(a)].

COC Policy

If COC determines that the family is ineligible, COC 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 hearing (see Chapter 14).

If COC uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before COC can move to deny the application. See Section 3-III.G for COC’s policy regarding such circumstances.

COC 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-VII.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 actually begins receiving assistance, lease execution; or (2) when a family is notified of its ineligibility.