

Chapter 4

RESIDENT SELECTION AND ASSIGNMENT PLAN

INTRODUCTION

It is the BHA's policy that each applicant shall be assigned an appropriate place on the BHA waiting list. The BHA will maintain separate waiting lists for its scattered site units and elderly communities, as well as its general occupancy communities. Elderly applicants and disabled applicants will be afforded the opportunity to be listed on either the general occupancy, or elderly and disabled lists. Scattered site units are awarded based on the scattered site assignment plan found later in this Chapter.

Applicants will be listed in sequence based upon date and time the application is received and the size and type of unit they require. Applicants are also afforded the opportunity to list their top three (3) preferences for housing. If none of these preferences are available, applicants are offered the longest vacant available unit and if that unit is declined in writing, a second assignment is immediately offered. After a second refusal of an offered unit, that applicant is removed from the waiting list.

In filling an actual or expected vacancy, the BHA will offer the dwelling unit to an applicant in the appropriate sequence, with the goal of accomplishing de-concentration of poverty and income-mixing objectives. The BHA will offer the unit until it is accepted. This Chapter describes the BHA's policies with regard to the number of unit offers that will be made to applicants selected from the waiting list.

BHA's Objectives

BHA policies will be followed consistently and will affirmatively further HUD's fair housing goals.

It is the BHA's objective to ensure that families are placed in the proper order on the waiting list so that the offer of a unit is not delayed to any family unnecessarily or made to any family prematurely. This chapter explains the policies for the management of the waiting list.

When appropriate units are available, families will be selected from the waiting list in their time-determined sequence.

By maintaining an accurate waiting list, the BHA will be able to perform the activities that ensure that an adequate pool of qualified applicants will be available to fill unit vacancies in a timely manner. Based on the BHA's turnover and the availability of appropriate sized units, groups of families will be selected from the waiting list to form a final eligibility pool. Selection from the pool will be based on completion of verification.

A.

MANAGEMENT OF THE WAITING LIST

The BHA will administer its waiting list as required by 24 CFR Part 5, Subparts E and F, Part 945 and 960.201 through 960.215. The waiting list will be maintained in accordance with the following guidelines:

The application will be a permanent file.

All applicants in the pool will be maintained in order of date and time of application receipt.

All applicants must meet applicable income eligibility requirements as established by HUD.

In accordance with the Pequonnock Apartment Settlement Agreement.

Opening and Closing the Waiting Lists

The Authority's waiting list is currently closed. The BHA, at its discretion, may restrict application intake, suspend application intake, and close waiting lists in whole or in part. The decision to close the waiting list will be based on the number of applications available for a particular size and type of unit and the ability of the BHA to house an applicant in an appropriate unit within a reasonable period of time.

BHA will advertise through public notice in local newspapers, minority publications and media entities. The notice will contain:

The dates, times, and the locations where families may apply

The programs for which applications will be taken

A brief description of the program

Limitations, if any, on who may apply.

The notices will be made in an accessible format if requested. They will provide potential applicants with information that includes the BHA address and telephone number, how to submit an application, and information on eligibility requirements.

Upon request from a person with a disability, additional time will be given as an accommodation for submission of an application after the closing deadline. This accommodation is to allow persons with disabilities the opportunity to submit an application in cases when a social service organization provides inaccurate or untimely information about the closing date.

The open period for the waiting list shall be long enough to achieve a waiting list adequate to cover projected turnover over the next 24 months. The BHA will give at least three days' notice prior to closing the list. When the period for accepting applications is over, the BHA will add the new applicants to the list by separating the new applicants into groups based on date and time of application.

The BHA will update the waiting list at least annually by removing the names of those families who are no longer interested, no longer qualify for housing, or cannot be reached by mail or telephone. At the time of initial intake, the BHA will advise families of their responsibility to notify the BHA when mailing address or telephone numbers change. An update application and letter will be mailed allowing the applicant 14 days to complete and return the update application. Failure to return the application within the specified time frame will result in the application being withdrawn from the Low Income Public Housing Waiting List.

The Authority will re-open the list when there are less than 600 applicants on the list.

Limits on Who May Apply

Any family asking to be placed on the waiting list for Public Housing rental assistance will be given the opportunity to complete an application. Handicapped persons will be given preference over non-handicapped persons when accessible units are available. In the event that no interested person with a handicap is on the waiting list, the apartment will be assigned to a non-handicapped person(s), who may be request to move to another unit should the need arise.

When the application is submitted to the BHA, it establishes the family's date and time of application for placement order on the waiting list.

B.

SITE BASED WAITING LISTS

The BHA will maintain a separate waiting list for its elderly only communities when the designation application for elderly only sites is approved by HUD. In the meantime, elderly and disabled applicants will be afforded the opportunity to be listed on both the general occupancy and elderly/disabled waiting lists. Applicants are also afforded the opportunity to list their top three (3) preferences for housing. If none of these preferences are available, applicants are offered the available unit and if that unit is declined in writing, a second offer will be made available immediately. After a second refusal of an offered unit, that applicant is removed from the waiting list.

Every reasonable action will be taken by the BHA to assure that applicants can make informed choices regarding the community(s) in which they wish to reside. The BHA will disclose information to applicants regarding the location of available sites, occupancy number and size of accessible units. The BHA will also include basic information relative to amenities such as day care, security, transportation, training programs, and an estimate of the period of time the applicant will likely have to wait to be admitted to units of different types.

Scattered site units will be considered for immediate assignment to eligible households off the public housing waiting list provided they meet the requirements as set forth in this Chapter, Section I.

The wait list for homeownership units is governed by this policy Chapter 4 Section S., the Authority's Section 32 Home Ownership Plan, Declaration of Restrictive Covenants, Purchase Agreement, and Lease to Own Lease.

C.

WAITING LIST PREFERENCES

The BHA will not operate a preference system for the public housing waiting list, except for: Involuntary displacement, which may include disaster or government action

D.

FACTORS OTHER THAN PREFERENCES THAT AFFECT SELECTION OF APPLICANTS

The BHA will match the characteristics of the available unit to the applicants available on the waiting lists. Factors such as unit size, accessible features, de-concentration or income mixing, income targeting, or units in housing designated for the elderly limit the admission of families to those characteristics that match the characteristics and features of the vacant unit available.

By matching unit and family characteristics, and, when available, applicant preference, 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.

E.

INCOME TARGETING

The BHA will monitor its admissions to ensure that at least 40 percent of families admitted to public housing in each fiscal year shall have incomes that do not exceed 30 percent of area median income of the BHA's jurisdiction.

Hereafter families whose incomes do not exceed 30% of area median income will be referred to

as "very poor families."

The BHA shall have the discretion, at least annually, to exercise the fungibility provision of the QHWRRA by admitting less than 40 percent of extremely poor families to public housing in a fiscal year, to the extent that the BHA has provided more than 75 percent of newly available vouchers and certificates to extremely poor families.

The fungibility credits will be used to drop the annual requirement below 40 percent of admissions to public housing for extremely poor families by the lowest of the following amounts: The number of units equal to 10 percent of the number of newly available vouchers and certificates in the fiscal year; or

The number of public housing units that 1) are in public housing projects located in census tracts having a poverty rate of 30% or more, and 2) are made available for occupancy by and actually occupied in that year by, families other than extremely low-income families.

The Fungibility Floor

Regardless of the above two amounts, in a fiscal year, at least 30% of the BHA's admissions to public housing will be to extremely low-income families. The fungibility floor is the number of units that cause the BHA's overall requirement for housing extremely low-income families to drop to 30% of its newly available units.

Fungibility shall only be utilized if the BHA is anticipated to fall short of its 40% goal for new admissions to public housing.

Low Income Family Admissions

Once the BHA has met the 40 percent targeted income requirement for new admissions of extremely low-income families, the BHA will fill the remainder of its new admission units with families whose incomes do not exceed 80 percent of the HUD approved area median income.

F.

UNITS DESIGNATED FOR THE ELDERLY

In accordance with the 1992 Housing Act, elderly families with a head, spouse or sole member at least 62 years of age will receive a preference for admission to such units or buildings covered by a HUD-approved Allocation Plan, except for the units that are accessible, which may be offered to persons with disabilities. Currently the Authority does not have any units specifically allocated/designated for elderly only or disabled only population. Upon HUD approval of this designation plan, the Authority will apply the following policy.

The BHA will take the following action when processing families for developments designated for the elderly:

When there are insufficient elderly families who wish to reside in a development, near-elderly families (head or spouse ages 55-61) receive a preference for this type of unit

When there are insufficient elderly or near-elderly families who wish to reside in a development, and units are ready for leasing more than 60 days, all other family types are eligible for such units. Families with members who require a unit with accessible features will receive preference for such units over families who do not require such features.

Procedure to Be Used When There Are Insufficient Applicants on the List

When there are insufficient applicants on the waiting list for an elderly-designated development, the development will contact applicants on the citywide waiting list to determine their interest in applying for the waiting list of the development with insufficient applicants on it.

If an interested elderly family is located, the housing management staff of the development with no waiting list will place the applicant on its waiting list and contact them to verify their eligibility and complete a full application when their name is close to the top of the waiting list.

Where the BHA anticipates that there are insufficient elderly or near-elderly families on the waiting list for these units the BHA will notify local senior service to recruit elderly families for the waiting list for these projects.

When there are no elderly applicants from other sites interested in the elderly-designated development, after conducting outreach, near-elderly applicants who are 46-62 years of age can be admitted to the elderly-designated development. If there are no near-elderly applicants on the list, the development housing management staff will contact near-elderly applicants on the citywide waiting list to determine interest and add to their list, if applicable.

G.

UNITS DESIGNATED FOR THE DISABLED

In accordance with the 1992 Housing Act, disabled families with a head, spouse or sole member who qualifies as a person with disabilities as defined in 24 CFR 945.105 will receive a preference for admission to units that are covered by a HUD-approved Allocation Plan. Currently, there are no units designated for disabled only. Upon HUD approval of a designation plan, the Authority will operate the program under the following policy.

The BHA has units designed for persons with mobility, sight and hearing impairments (referred to as accessibility units). These units were designed and constructed specifically to meet the needs of persons requiring the use of wheelchairs and persons requiring other modifications.

Preference for occupancy of these units will be given to families with disabled family members who require the modifications or facilities provided in the units.

Special Provision for Disabled Applicants

Generally, the BHA may not inquire if an applicant has a handicap or inquire as to the nature or severity of a handicap. The BHA is permitted to make inquiries to the extent necessary to:
Determine the applicant's eligibility or level of benefits under the program. When the sole basis for determining an individual's eligibility is based on the person's handicap or disability, the BHA must verify the handicap or disability

Determine if an applicant is qualified for a barrier-free unit available only to persons with disabilities

Determine if a handicapped applicant may qualify as an "elderly family" and be entitled to admission to an elderly complex

Verify an individual's disability to determine whether "reasonable accommodation" in rules, practices or services requested by a disabled applicant may be necessary.

The Authority will make reasonable accommodation to the known physical or mental limitations, as defined by Section 504 of the Rehabilitation Act of 1973, of otherwise qualified applicants with handicaps unless it can be demonstrated that such accommodation would impose an undue hardship on the operation of the Authority.

All information pertaining to an individual's handicap or disability is confidential.

Reasonable Accommodations

Reasonable accommodations are actions taken to ensure that the Authority's programs are readily

accessible and usable by individuals with disabilities. Examples of reasonable accommodations would include, but are not limited to the following:

- Physical alterations to existing units
- Change or exceptions to policies, procedures or practices
- Provision of services
- Assignment of aides to beneficiaries
- Development of alternate accessible housing resources
- Provision of auxiliary aides.

The Authority determines the reasonableness of those actions and/or financial burden such actions create. The Authority will not take those actions that would result in an undue burden.

Undue Burden

Relative to reasonable accommodations for disabled residents and applicants, an undue burden can be either administrative or financial in nature and would represent a significant negative impact on the Authority's operation.

The nature and cost of the accommodations will be evaluated relative to the financial and administrative commitment that is required and the Authority's current capacity to fulfill that commitment (i.e., budget and staff resources)

The BHA may not require applicants to provide access to confidential medical records in order to verify disability status

When the BHA makes inquiries as to the nature and severity of disabilities, it will do so for all applicants to whom such inquiries may pertain whether or not they have disabilities. Subject to the limitations above, the BHA may make inquiries necessary to determine the applicant's eligibility, level of benefits and suitability for tenancy provided such inquiries are made of all applicants whether or not they have disabilities. These inquiries include:
Inquiring whether an applicant is a current illegal abuser or addict of a controlled substance or is currently engaging in the illegal use of drugs (see Section 512 of the Americans with Disabilities Act 1990, 104 Stat. 327)

Inquiring whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance.

If a disabled applicant does not meet the BHA's criteria for suitability for tenancy, the applicant must be admitted if he/she meets the BHA's criteria for suitability through reasonable accommodation.

Objectionable behavior (failure to pay rent, disturbing neighbors, destroying BHA property, etc.) on the part of a handicapped applicant may form the basis for rejection, where such behavior cannot be corrected by reasonable accommodation even if the behavior is related to a disability. The BHA will not assume that the presence of a particular disability or disabling condition automatically disqualifies an applicant for participation in the program or for a particular dwelling or type of dwelling. Example: A mobility impaired applicant may not be denied a unit with its only bathroom on the second floor, nor may a special showing be required by a disabled applicant.

If an applicant's sole qualification as an elderly family depends on a disability, the BHA must verify the existence of the disability or the applicant must forego the \$400 elderly deduction. The BHA will make inquiries regarding the nature and severity of disabilities to the extent necessary to determine whether the family's adjusted income should reflect a deduction based on Handicapped Assistance Expenses (See 24 CFR 913.102)

The BHA will make inquiries regarding the nature and severity of disability to the extent necessary to determine whether a Personal Care Attendant is essential to the care and well being of a handicapped or disabled person (See 24 CFR 913.106 (c) (5))

The Verification of Disability includes receipt of Social Security or Supplemental Security Income disability benefits. If such benefits are not being received, proof of residence in an institution, documents showing hospitalization for a disability or verification by a health or service professional such as a social worker may provide a basis for verification. For verification, generally, direct contact with a third party is preferable to accepting documents provided by the applicant

The BHA may not require a statement or verification from a physician when adequate verification is available from other sources

In evaluating a disabled applicant, the BHA must consider “mitigating circumstances” as with any applicant. In the case of a person with disabilities, mitigating circumstances may include participation in treatment programs and the availability of services and assistance from the community, friends and family

When an applicant (including applicants who are not disabled) cannot provide the customary information required to verify suitability for residency such as references from former landlords and credit reports, the BHA may consider other sources of information such as personal references, institutions where the applicant has lived, doctors, therapists and service agency personnel. Home visits and interview may also provide valuable information for making determination of suitability for residency.

H.

GENERAL OCCUPANCY UNITS

General occupancy units are designed to house all populations of eligible families. In accordance with the BHA’s occupancy standards, eligible families not needing units designed with special features or units designed for special populations will be admitted to the BHA’s general occupancy units.

I.

SCATTERED SITE UNITS

The BHA owns and operates a number of scattered sites throughout the City of Bridgeport. These units are made up of single-family homes, duplexes and multi-family developments that are located in different neighborhoods.

The BHA will select families for the scattered site units through the following priority: Current public housing residents based on the criteria set forth in this Chapter and Section including Chapter 9 of this policy statement. Residents will be notified of vacancies in the scattered site units and on the scattered site unit waiting list via the Resident Newsletter and monthly postings in the Site Management Offices. Interested residents must contact their Site Manager to inform BHA of their interest in the Scattered Site program and follow the procedures set forth in Chapter 9.

Resident applicants will be selected for scattered site housing based on the following criteria:

Good BHA Tenancy

Resident applicants for BHA scattered site housing must show a minimum of one (1) year of responsible BHA tenancy, including:

Excellent rent paying habits – applicant must have good and consistent rent payment history of monthly resident rent, including zero (0) late payments over a period of not less than two (2)

years

Positive credit rating – applicant must have a good credit rating at the time of the scattered site housing request

Full compliance with lease obligations – applicant must be consistently current in all of their lease obligations over a time period of not less than two (2) years

Proven good housekeeping habits – applicant must have a history of good housekeeping, maintaining the BHA unit in a clean and safe condition, as proven by routine maintenance inspection reports

Participation in BHA activities and resident organization meetings, either at their specific housing community or the general Resident Advisory Board meetings. A complete listing of all eligible BHA-sponsored community activities can be found at each Site Management Office. Notice from a Site Manager or activity coordinator or an attendance sheet can serve as verification of participation.

Resident applicants who have been with the Authority for less than one year will not be considered for this type of transfer as they have been recently housed.

Applicants from the public housing waiting list that meet the following criteria, in addition to requirements set forth in Chapter 2 of this policy:

Meet the targeted income requirement of the area median income based on family size:

50 – 80% of AMI

30 – 50% of AMI

Positive credit report

Clean background checks for all members over 16 years of age in the household

Proven housekeeping habits based on HQS inspection conducted by the Authority

The selection process for these families will be consistent with HUD's affirmative fair housing objectives (24 CFR 960.211 (b)(3)) and in compliance with the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964.

Self Sufficiency

Resident applicants for BHA scattered site housing must be able to meet all financial obligations, including rent and utilities and be able to apply for and maintain all utilities in his/her name. The Authority encourages all interested applicants to participate in a self-sufficiency program to acquire the skills so they may live in a scattered site setting as independently as possible.

Panel Review

Resident applicants for BHA scattered site housing must be reviewed by a panel of four persons composed of BHA staff for final housing consideration. BHA staff referral will be based on the requirements listed above, and final eligibility for scattered sites will be approved for eligible applicants.

J.

DECONCENTRATION OF POVERTY AND INCOME-MIXING

The BHA's admission policy is designed to provide for de-concentration of poverty and income mixing by bringing higher income residents into lower income projects and lower income residents into higher income projects. Gross annual income is used for income limits at admission and for income-mixing purposes.

Skipping of a family on the waiting list specifically to reach another family with a lower or higher income is not to be considered an adverse action to the family. Such skipping will be uniformly applied until the target threshold is met.

The BHA will gather data and analyze, at least annually, the resident characteristics of its public housing stock, including information regarding resident incomes, to assist in the BHA's de-concentration efforts.

The BHA will use the gathered resident incomes information in its assessment of its public housing developments to determine the appropriate designation to be assigned to the project for the purpose of assisting the BHA in its de-concentration goals.

If the BHA's annual review of resident incomes indicates that there has been a significant change in the resident income characteristics of a particular project, the BHA will evaluate the changes to determine whether, based on the BHA methodology of choice, the BHA has met the de-concentration goals.

Deconcentration and Income-Mixing Goals

Admission policies related to the deconcentration efforts of the BHA do not impose specific quotas. Therefore, the BHA will not set specific quotas, but will strive to achieve deconcentration and income mixing in its family developments through regular monitoring of the Authority's Combined Resident Ledger.

K.

OFFER OF PLACEMENT ON THE SECTION 8 WAITING LIST

The BHA will not merge the waiting lists for public housing and Section 8. However, if the Section 8 waiting list is open when the applicant is placed on the public housing list, the BHA must offer to place the family on both lists. If the public housing waiting list is open at the time an applicant applies for Section 8, the BHA must offer to place the family on the public housing waiting list.

The Housing Authority will comply with all the terms of the Pequonnock Apartment Settlement Agreement. The Authority will continue to refer public housing applicants on the wait list to the Authority's Section 8 Voucher Program. The Authority will mail a response letter to applicants requesting their choice between public housing and Section 8. Should they choose Section 8, they shall be referred to the Section 8 Administrative Office. Should they choose public housing, the applicant proceeds with verification procedures. Applicants must decide within 14 days of receipt of the letter. Should an applicant choose Section 8 then decide to return to the public housing waiting list, they shall be reinstated as a public housing applicant and may proceed towards verification.

L.

REMOVAL FROM WAITING LIST AND PURGING [24 CFR 960.204(a)]

The waiting list will be purged at least once a year by a mailing to all applicants to ensure that the waiting list is current and accurate. The mailing will ask for current information and confirmation of continued interest.

If an applicant fails to respond within 14 working days s/he will be removed from the waiting list. If a letter is returned by the Post Office without a forwarding address, the applicant will be removed without further notice, and the envelope and letter will be maintained in the file. If a letter is returned with a forwarding address, it will be re-mailed to the address indicated.

If an applicant is removed from the waiting list for failure to respond, they will not be entitled to

reinstatement unless a person with a disability requests a reasonable accommodation for being unable to reply with the proscribed period.

Notices will be made available in accessible format upon the request of a person with a disability.

M.

OFFER OF ACCESSIBLE UNITS

The BHA has units designed for persons with mobility, sight and hearing impairments, referred to as accessible units.

No non-mobility impaired families will be offered these units until all eligible mobility-impaired applicants have been considered.

Before offering a vacant accessible unit to a non-disabled applicant, the BHA will offer such units:

First, to a current occupant of another unit of the same development, or other public housing developments under the BHA's control, who has a disability that requires the special features of the vacant unit

Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant unit.

When offering an accessible/adaptable unit to a non-disabled applicant, the BHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features of the unit and there is another unit available for the applicant. This requirement will be a provision of the lease agreement.

N.

PLAN FOR UNIT OFFERS

When the waiting list is re-opened, the following guidelines will be used. The BHA plan for selection of applicants and assignment of dwelling units to assure equal opportunity and non-discrimination on grounds of race, color, sex, religion, or national origin is as follows:

The BHA will offer the applicant the next available unit of appropriate size in whatever complex the vacant unit may exist, attempting first to match the applicant's preferences with the unit assigned. If the applicant refuses the offer, they will be given a second offer, and should they refuse, they will be removed from the waiting list. The second refusal will result in the applicant being withdrawn from the waiting list. The applicant will have to wait a period of 24 months before reapplying provided that the wait list is open.

If an applicant has not responded to a unit offer mailed to the last known address within ten (10) calendar days from the date of the notice, the application will be withdrawn and the file documented accordingly.

For the purposes of this policy, the applicant would not be considered to have been offered a unit if he/she informs BHA of one of the following circumstances:

The unit is not of the proper size and/or type and the applicant would only be able to reside there temporarily.

The unit contains lead-based paint, and accepting the offer could result in subjecting the applicant's child(ren) under seven years of age to lead-based paint poisoning. The applicant is unable to move at the time of the offer and presents clear evidence that substantiates this to the BHA's satisfaction. Examples of this include:
A doctor verifies that the applicant has just undergone major surgery and needs a period to recuperate.
A court verifies that the applicant is serving on a jury that has been sequestered.
Accepting the offer would result in undue hardship to the applicant not related to consideration of race, creed, color, national origin or language, such as making employment or day care facilities inaccessible, and the applicant presents clear evidence which substantiates this to the BHA's satisfaction.

O.

CLOSING OF PUBLIC HOUSING WAIT LIST

The Authority reserves the right to close the public housing waiting list when the list reaches above 600 applicants. The Authority will publish a notice indicating its intent to close the wait list thirty days (30) prior to closing the wait list.

P.

CHANGES PRIOR TO UNIT OFFER

Changes that occur during the period between removal from the waiting list and an offer of a suitable unit may affect the family's eligibility or Total Resident Payment. The family will be notified in writing of changes in their eligibility or level of benefits and offered their right to an informal hearing when applicable.

Q.

APPLICANT STATUS AFTER FINAL UNIT OFFER

When an applicant rejects the final unit offer, the BHA will remove the applicant's name from the waiting list.

Removal from the waiting list means the applicant must wait 24 months before reapplying for the public housing program.

If the unit offered is inappropriate for the applicant's disabilities, the family will retain their position on the waiting list.

R.

TIME-LIMIT FOR ACCEPTANCE OF UNIT

Applicants must accept a unit offer within ten (10) working days of the date the offer is made. Offers made over the telephone will be confirmed by letter. If unable to contact an applicant by telephone, the BHA will send a letter.

Applicants With a Change in Family Size or Status

Changes in family composition, status, or income between the time of the interview and the offer of a unit will be processed. The BHA shall not lease a unit to a family whose occupancy will overcrowd or underutilize the unit.

S. INCENTIVE TRANSFER POLICY FOR HOMEOWNERSHIP UNITS and LEASE-TO-OWN PLAN UNDER THE SECTION 32 HOMEOWNERSHIP PROGRAM

Residents of public housing and Section 8 Voucher Participants may be eligible to participate in the Authority's Section 32 Homeownership Program. However, until as such time as the Authority receives approval from HUD for its homeownership plan, the Authority will operate the selected units, to include Pembroke II, Victorian Gardens and other to be determined units, as scattered site housing and will apply the following requirements for transfer and occupancy.

Residency Requirements

The Authority will review applications in the following priority:

Current residents of public housing for more than two years

Current residents of public housing for less than two years but more than one year

Eligible applicants from the public housing wait list

Once HUD has approved the homeownership plan, Section 8 Voucher recipients would be eligible to participate in the program. Residents may co-apply with a non-resident provided the non-resident fulfills all other admission requirements, their combined income does not exceed 80% of area median income for their family size, and is verified as a family member, limited to sibling, parent, adult child, grandparent, or grandchild.

Income Requirements

Applicants must earn a minimum of \$25,000 to be eligible for units at Pembroke II, Victorian Gardens, and selected scattered sites. Applicants cannot exceed 80% of area median income for their family size, except for law enforcement officials.

Units to be sold

The Authority has identified Pembroke II, Victorian Gardens and to be determined scattered sites as part of this lease-to-own program and occupancy of these units will be governed by this policy, Section 32 Homeownership Plan, Lease-to-Own lease, and Declaration of Restrictive Covenants.

Other Requirements

After meeting the residency and income requirements, recommendation for transfer or admission approval will be allowed only if the household meets all of the other following requirements:

Head of household must have stable employment history

Excellent rent payment history not to exceed 3 late payments in the last two years for residents over two years; not to exceed 2 late payments for residents less than two years but more than one year; or written positive report from the landlord for applicants off the public housing wait list

Clean criminal background history to include co-applicants and additional household members over the age of 16

Good credit history

Excellent inspection reports under the UPCS or HQS standards depending on residency

Commitment to meeting the program requirements of the Section 32 homeownership program

Date/Time and lottery in the event of excessive and approved applications.

Household Size Requirements

The Authority will make every effort to occupy the units by appropriate sized families based on the Authority's admissions guidelines. But since HUD does not have statutory requirements specifying the number of persons who may live in a unit of various sizes, the Authority is permitted to develop occupancy standards provided it does not have the effect of discriminating against families with children. As such Chapter 5 Section A of this policy statement provides guidance for determining bedroom size. Subsequently, the Authority is permitted to have exemptions under Chapter 5 Section B of this policy statement. Since the identified units are being marketed as homeownership units, the Authority will allow for households who do not meet the unit size guidelines but meet all other requirements of this Chapter and Section to occupy the identified units under the following circumstances:

To avoid long-term vacancies

Does not displace an eligible applicant's household who meet the unit size requirement from occupying the same unit

To market the unit as prospective homeownership units

Does not discriminate the applicant on the basis of their familial status

Or to provide reasonable accommodations due to disability

Notices

The Authority will market this program through local site notices, BHA newsletter, The Word, flyers, posters, and mailings to all residents of public housing and Section 8 voucher recipients. The notices will be generated by the Executive Office indicating when and where applications are available for review and pick up.

Procedural Requirements

The Authority will review previously submitted applications for the Section 32 Homeownership Program/Incentive Transfer Policy and will occupy Pembroke II units with eligible and approved applicants. Approved applicants must then submit a transfer request with their Site Manager. The request shall be forwarded to the Resident Selection Office for assignment and transfer of the household's file to the receiving Site Manager's office.

For all other vacant homeownership units, interested applicants must complete and submit the Section 32 Homeownership Form, which requires submission of documents such as paystubs, IRS tax returns, credit reports and other reports which would assist the Authority in determining the eligibility of the applicant. Application forms are available at the Community Affairs Department located at 301 Bostwick Avenue; Resident Selection Office located at 505 Trumbull Avenue; The BHA Administrative Offices located at 150 Highland Avenue; the Section 8 Administrative Building located at 415 Warren Street; other housing sites and scattered site office; and our website at [HYPERLINK "http://www.bridgeporthousing.org"](http://www.bridgeporthousing.org) www.bridgeporthousing.org. Completed forms must be returned to the Resident Selection Office.

A homeownership selection committee shall review the preliminary eligibility requirements of the applicant and co-applicant if appropriate. The order of priority to which the recommendations will be made will be as follows:

Residency requirement

Income eligibility

Rent history

Criminal background checks

Credit history

Inspection reports

Appropriateness of family size

Commitment to lease-to-own process and to homeownership training program

Date/Time then lottery in the event of excessive and approved applications

Once an applicant has been recommended and approved, the applicant must submit a transfer

request with the Site Manager or Section 8 Office. The request shall be forwarded to the Resident Selection Office for assignment and transfer of file documents. This transfer is not in conflict with the Authority's current transfer policy. Transfers will be limited to families who would be considered first-time homebuyers as defined by the U.S. Department of Housing and Urban Development.

Prior to transfer, the applicant must agree and sign to the provisions of the Lease-to-Own lease. Upon signing, the applicant's residency will be governed by this document including the Authority's Section 32 Homeownership Program and Declaration of Restrictive Covenants, which requires that applicants participate in a lease-to-own phase for a prescribed time period prior to exercising their purchase option, once approved by HUD. Otherwise, the current lease governs the applicant's residency.

During the lease-to-own phase, families are still considered public housing residents and must comply with requirements under the Authority's Low-Income Public Housing Admissions and Continued Occupancy Policy. However, residents are afforded maintenance services to include warranty, emergency and routine maintenance issues. During the lease-to-own period, the household must remain current in all lease obligations and monthly rental payments in order to complete the lease purchase option.

Rent Payment Option

As identified in the Authority's Admissions and Continued Occupancy Policy, during the lease-to-own phase, residents will be afforded the option to pay their rent based on their income or based on a flat rate. The income based rent shall not exceed 35% of their income. The flat rent schedule is identified in Chapter 6 Section N of this policy.

Escrow Account

During the lease-to-own phase, households will be required to pay 35% of their income towards this program. Thirty percent will be applied towards rent. The five percent can be escrowed under their name and managed by the Authority or by a community agency that operates an Individual Development Account (IDA), which matches dollar for dollar the residents' savings and may only be used for homeownership activities. Upon sale of the unit, the household must utilize this escrowed account towards down payment and closing costs. Should the household decide not to exercise their right of first refusal, the Authority is obligated to return the escrowed amount including interest. For the IDA program, the resident must comply with those program requirements.

Homeownership Training

Once a participant moves into the unit, they must participate in a HUD certified homeownership training program for a minimum. Attendance and completion to the scheduled trainings are requirements of the program. Failure to comply will result in termination from the program.

Purchase of unit

The participant must purchase the unit at the end of 12 months of their residency. The Authority may grant a one-time extension of the applicant's requirement to purchase the unit for another 12 months at the request of the resident applicant and for good cause.

The Authority will conduct a fair market analysis of the identified properties values in order to set a baseline price. However, the selling price will be the appraised value conducted by an independent MIA inspector one month prior to exercising their right of first refusal. Families will then take out a first mortgage not to exceed 35% of adjusted household income for the principal, interest, taxes, and insurance. In cases of Pembroke II and other to be determined scattered site, the Authority cannot include utilities and/or association fees. A Silent Second Mortgage will be utilized in order to make up any difference between the appraised value and the homeowner's first

mortgage.

The sale and resale of the units will be governed by the Section 32 homeownership Plan, Lease-To-Own Lease, Declaration of Restrictive Covenants, Deed, and/or Purchase Agreement. Terms and conditions of the sale of the unit are spelled in its entirety in the given documents.

Non-purchasing residents

The Authority reserves the right to relocate households who do not exercise their right of first refusal, at the expense of the Authority, if in the best interest of the Authority and prospective homeownership applicants. The Authority will comply with 24 CFR 906.13 and 24CFR 906.23 when relocating a family.

Records, Accounts and Reports

The following staff will administer and maintain the properties:

Executive Director will be responsible for the overall oversight of the implementation of the plan
The Special Assistant to the Executive Director will be responsible for the daily execution of the details of the plan; will coordinate with the Chief of Staff, Chief Financial Officer, Deputy Director, Directors of Modernization, Community Affairs, Section 8, Maintenance and Property Management; will report to the Executive Director; will coordinate with the homeownership training counseling agency; lead the Home ownership Selection Committee

Chief Financial Officer will be responsible for maintaining accounting records of all financial transactions in coordination with the servicing bank

Director of Modernization will be responsible for the proper completion of the rehabilitation process

Director of Property Management will assist in marketing the program to the Authority's participants, site management, collection of rent and maintenance of site during lease to own phase

Director of Section 8 will assist in marketing the program to Section 8 voucher recipients, participate in the Selection Committee

Resident Selection Department will process approved applicants file documents according to transfer policies

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