

PH OCCUPANCY (PHO)



Professional Development

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INTERNATIONAL ASSOCIATION OF HOUSING & REDEVELOPMENT OFFICIALS

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OCCUPANCY FUNCTION OVERVIEW

CHAPTER I



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TRAINING OBJECTIVES

- Identify the key tasks and processes of the Occupancy Cycle functions
- Identify critical Federal Regulations and Housing Agency Admission and Continued Occupancy Police (ACOP) requirements and discretionary elements.
- Provide opportunities to apply critical policies and regulatory requirements

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**INTRODUCTION**

- Public Housing – The program provides rental units owned and managed by the PHA as Landlord
- Housing Choice Voucher (HCV) – This program provides an eligible family authorization to search for housing in the open market with a private landlord

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**OCCUPANCY FUNCTION OVERVIEW**

- A local housing agency receiving subsidies from the federal government under an Annual Contributions Contract (ACC) is subject to all applicable federal laws and regulations.

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**FULL OCCUPANCY CYCLE OVERVIEW**

- Applications
- Marketing/Outreach
- Waiting List management
- Initial occupancy and impact on the property
- Eligibility regulatory factors Admissions and Continued Occupancy Plan (ACOP)
- Application processes and interviewing
- Key elements of the Lease as a basis for Screening and Selection
- Initial occupancy and impact on the Property and Management
- Recertification/Documentation/Verification organization of files
- Termination – Management or Resident initiated

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### ELEMENTS OF AGENCY DIVERSITY

- Size of the agency
- Location
- Type and size of properties
- Housing market
- Local politics/Local Policies
- Active advocacy groups
- Jurisdiction housing needs

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### SIZE OF AGENCY & LOCATION IMPACTS

- Organizational structure
- Staffing
- Regulatory requirements
- Asset Management
  - 250 units
- Urban/Rural Job opportunities
- Housing costs
- Housing types
- Types of industry
- Available assistance programs

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### SIZE/TYPES OF PROPERTY & LOCAL MARKET

- Sizes of developments
  - Single unit
  - High-rise
  - Bedroom sizes
- Unit bedroom sizes
- Rental costs and local Housing Market
- Population age
- Housing conditions
- Labor costs

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**LOCAL POLITICS**

- Public Housing Agencies are entities of State Legislation. They are quasi-governmental agencies, with a Board of Commissioners who act in the best interest of the agency and intended to protect agencies from undue political influence
- Politics and political agendas can enhance or impair Housing Agency operations

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**COMMUNITY NEEDS**

- Communities will have different focuses
  - Homeownership
  - Rental
  - Elderly and Disabled
  - Special populations, e.g., Veterans
- The communities housing focus should be captured in the HA's 5-year plan and is a part of the Consolidated Plan

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**OCCUPANCY FUNCTION OVERVIEW**

Two Major Tasks of the Occupancy function:

1. Moving applicants and residents in and out of rental units.
2. Annual recertification processes and compliance issues.

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## OCCUPANCY FUNCTION OVERVIEW

- Agency Properties' Marketability – a broad range of eligible households are willing to accept units at the properties
- *Why does a property's marketability matter in the 21<sup>st</sup> Century?*
- Agency Properties' Financial Viability – Rent and subsidy cover the cost of day-to-day operation of the property/Asset Management Project (AMP)
- *Why is the property's financial condition important?*

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## PROPERTY'S MARKETABILITY

- The community's image and perception of the agency and its properties.
- Location of the property.
- The general appearance (curb appeal) of the property (buildings, landscaping, entrances, parking areas, etc.)
- Available amenities -- air conditioning, washer/dryer hook-ups, storage space, etc.
- Overall quality of maintenance.
- Community/Resident behavior and reputation.
- Safety and security.

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## FINANCIAL VIABILITY - WHY IS IT IMPORTANT & WHAT DOES IT MEAN?

- Subsidies are calculated based on characteristic and performance of properties Asset Management Program (AMP) Operating fund provides subsidies at the Property Expense Level (PEL), based on Eligible Unit Months for a 12 month period. Given appropriations, the full subsidy is given if the property is at 97%
- Utility Expense Level (UEL) and "Add On" amounts for which the property qualifies
- Marketability and financial viability are interdependent

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**OCCUPANCY CYCLE**  
CHAPTER 2

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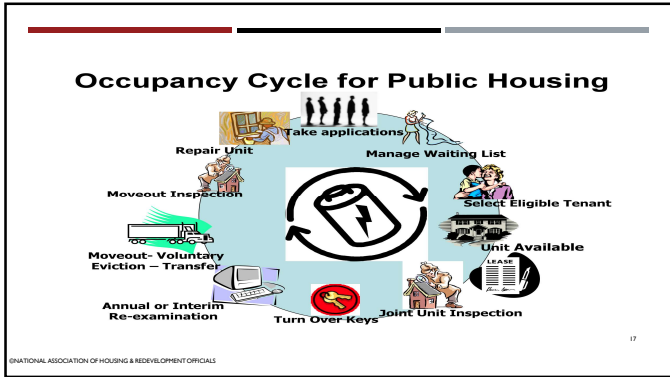
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**THE OCCUPANCY CYCLE: TAKING APPLICATIONS**

Key Elements

- Marketability of the Portfolio's Properties
- Marketing to the broad range of potential applicants
- Application types -- formal/informal
- Agency policies, processes and procedures
- Regulatory compliance
- Placing applications on the waiting list

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**THE OCCUPANCY CYCLE: THE AGENCY WAITING LIST**

Key Elements – Agency Policy

- Waiting List “open” or “closed”
- Occupancy Standards (Bedroom size)
- Preferences/admission and continued occupancy policies (ACOP)
- Waiting list management
- Purging the waiting list

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**INITIAL OCCUPANCY CYCLE: APPLICATION PROCESS & ELIGIBILITY**

- HUD requires verification of all eligibility criteria.

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**TAKING APPLICATIONS**

- Pre-Applications
  - Takes basic information of the family
  - A Public Housing Authority with extended waiting lists should consider a pre-application
- Full Applications
  - All the families information is taken for verification purposes

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## WAITING LIST

- HAs may open and close a waiting list at any time
  - HA may open parts of the waiting list, such as for a bedroom size.
- When the Waiting List or Sub-list is closed, best practice is to advise inquiries where the opening of the list will be advertised. Keeping a contact list of potential applicants is often misunderstood, and potential applicants "may think" they are on a waiting list.
- All openings and closings must be publicly advertised
- *When the Waiting list is open, all applications must be accepted. Failure to do so can result in Fair Housing violations*

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## WAITING LIST ORGANIZATION

- Public Housing Agencies have great flexibility in the waiting list organization
  - Site Based/Centralized/Combination
  - Household members and bedroom sizes
  - Preferences
  - Purging policies
- The structure should be outlined in the ACOP

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## DETERMINING APPLICANT ELIGIBILITY & CERTIFICATION

- Federal Requirements
  - Income eligibility
  - Meeting the definition of "Family" (per federal definition (24CFR5.403), and Agency ACOP
  - Provide valid Social Security Numbers
  - Meet Citizenship and Eligible Immigrant Definitions
  - Household size and HA unit inventory size are compatible
  - Criminal federal regulatory requirements and ACOP criteria are met
  - Local HA screening and selection criteria for tenants, and for honoring the lease contract are satisfied

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## ACCEPTING & CERTIFYING ELIGIBILITY

- Verification and certification of eligibility is generally valid for 90 days
  - Applicants should expect unit offer before the 90 day expiration
  - This process requires effective communication and projection of type and size of units that are prepared for occupancy. This is critical whether waiting lists are site-based, centralized or some combination

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## DENYING ADMISSION

- Criminal activity
  - The Housing Agency should contact the applicant and give them an opportunity to review the information before the denial.
    - Mistakes can be made, make sure you're not denying an eligible applicant
- For other reasons
  - The Public Housing Agency must give the applicant a chance for an informal hearing review by staff, other than the staff making the "deny" decision. This is not a "Grievance Procedure"

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## INITIAL OCCUPANCY CYCLE: PREPARATION & INSPECTION OF THE UNIT

### Key Elements

- Standards for preparation and condition
- Punch list – and other methods for documentation
- Addressing deficiencies
- Management should assure the condition of the unit meets occupancy standards

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### INITIAL OCCUPANCY CYCLE - LEASE CONTRACT PROCESS

- Lease documents are reviewed with an applicant that has accepted a unit offer and has been certified through verification of information. Highlights include:
  - Time/Location of leasing – office or unit
  - Rent and method of collection/Security deposit/Late fees
  - Guests and Visitors
  - Annual and Interim Recertification and Income reporting
  - Maintenance requests and Standards for maintaining the condition of the unit
  - Requirement that additions to the household be reported to the Agency
  - Community Service/Pet Policies/Reasonable accommodation
  - Notices and Grievance Procedure
  - Occupancy standards and Transfers

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### INITIAL OCCUPANCY CYCLE - INSPECT UNIT / TURN OVER KEYS

- Best Practice is to Inspect the unit with the new resident
- The punch list documenting the condition of the unit and any other methods (photos) are completed at this time
  - Federal Regulations require HA agent and resident sign off on the punch list and any other documentation method
- This is an opportunity to communicate agency expectations on maintaining the unit
- Also, the opportunity to build a relationship with the new resident, answer questions and restate important lease requirements

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### THE ONGOING OCCUPANCY CYCLE: ANNUAL & INTERIM CERTIFICATIONS

#### Key Elements

- Timing – Annuals and Interims
- Resident cooperation
- Obtaining and verifying information
- Occupancy standards
- Community Service compliance\*
- Earned Income Disallowance\*
- Recalculating rent/offering alternative rents
- Updating the file and entry in PIC
- Giving notice of the current rent amount to the resident

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## ANNUAL & INTERIM CERTIFICATION

- Public Housing Authority must *certify* for continued occupancy
  - Family composition and Unit size
  - Income – Increase / Decrease
  - Continued eligibility
    - Not a lifetime sex offender in household
    - Community Service
    - Mixed Family – citizen/Eligible Immigrant still in the household

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## THE OCCUPANCY CYCLE: MOVE OUT

### Key Elements

- Voluntary move
- Change in economic status, employment, etc.
- Involuntary move
- Transfers – over/under housed/Disability (504)
- Rehabilitation/demolition
- Grievance Procedure
- Eviction

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## THE OCCUPANCY CYCLE: MOVE OUT INSPECTION

### Key Elements

- Inspection compared to initial inspection and any work completed on the unit
- Work order or other document that identifies vacant unit preparation needs and costs
- Settlement of resident damage versus “normal” wear and tear to security deposit
- Proper legal notices – returning security deposit or retaining security deposit or some portion

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**THE OCCUPANCY CYCLE: PREPARE UNIT FOR OCCUPANCY**

Key Elements

- Timing
- Available manpower/materials
- Amount of work required
- Projecting completion
- Meeting standards
- Communication

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**REPAIR & PREPARE**

- Vacant units have a negative impact on properties and can greatly impact financial viability
- Turnaround times can have a negative impact on performance metrics and subsidies

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**OUTREACH**  
CHAPTER 3

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## MARKET / OUTREACH ANALYSIS

- The Housing Agency needs data analysis of:
  - Affirmative marketing/outreach to a broad range of potential applicants
  - Waiting list applicants response to purging and eligibility status
  - Current residents demographics
  - Applicant refusal of Units offered
- Analysis is key to assure compliance with Fair Housing

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## MARKETING & AFFIRMATIVE OUTREACH POSSIBLE LOCATIONS FOR OUTREACH

- Places of employment – Human Resource offices – hospitals, nursing homes, hotels, schools, companies, etc.
- Unemployment offices
- Social Services offices
- Post offices
- Grocery stores
- Shopping Malls
- Public transportation
- Faith Based Institutions
- Organizations representing the disabled, Senior Centers or Organizations
- Local Newspapers and “Penny Saver” type publications

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## TARGETING & DECONCENTRATION

### The Three Income Tiers\*

1. Low Income (<80%AMI) (Eligibility)
2. Very Low Income (<50% AMI)
3. Extremely Low Income (ELI) (<30%AMI) (Income Targeting)

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## TARGETING REQUIREMENT

- 40% of new admissions must be ELI
- If the agency also administers the Section 8 Housing Choice Voucher program, and that program's new admissions exceed the 75% Extremely Low Income Targeting requirement, the excess can be credited to the Public Housing Program for that fiscal year.

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## DECONCENTRATION - ACCESS TO ALL POTENTIAL INCOME ELIGIBLE APPLICANTS

- The agency with Centralized Waiting Lists should classify buildings as
  - Higher income or Lower income
- The HA should attempt to maintain a balanced community. Targeting and Deconcentration regulations are another reason for Marketing/Outreach
- The HA may skip over families based on their income to achieve this goal

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## OTHER TOOLS FOR DECONCENTRATION

- Using systems of ACOP preferences (such as a working preference)
- Skipping a family on the waiting list to reach another family in an effort to further the goals of the Agency Deconcentration policy supports financial viability
- Through the Annual Plan and policies, the process provides for other strategies permitted by statute to achieve and promote deconcentration of poverty and income mixing. Historically referred to as Broad Range of Incomes

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**NON-DISCRIMINATION**

- Race
- Color
- National Origin
- Sex
- Age
- Disability
- Religion
- Familial Status
- Sexual Orientation, Gender Identity/Status - not federally protected but protected by Equal Access Rule, some State laws (PIH 2014-20 & 224, CFR 5.100)

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**FAIR HOUSING ACT**

- Deny anyone the opportunity to apply to rent or purchase housing, nor to deny any qualified applicant the opportunity to lease or purchase housing suitable to their needs.
- Provide anyone housing that is different from that provided to others.
- Subject anyone to segregation as disparate treatment.
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program.
- Treat anyone differently in determining eligibility or other requirements for admission, including the terms and conditions of a lease.
- Deny anyone access to the same level of services.

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**FAIR HOUSING ACT**

- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program.
- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class.
- Discriminate in the provision of brokerage services or in residential real estate transaction.
- Discriminate against someone because they are related to or associated with a member of a protected class.

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**TITLE VI**

- HUD expects that recipients have an affirmative obligation to take reasonable steps to remove or overcome any discriminatory practice or usage that subjected individuals to discrimination based on race, color or national origin, etc.

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**SECTION 504 PROHIBITS DISCRIMINATION BASED ON A DISABILITY**

- Programs should be accessible by:
  - Making and paying for reasonable structural modifications to units and/or common areas that are needed by applicants and tenants with disabilities.
  - Operating housing that is not segregated based upon disability, unless authorized by federal statute or executive order

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**SECTION 504**

- Providing auxiliary aids and services necessary for communication with persons with disabilities
- Developing a "needs assessment" of the need for accessible units for applicants and tenants, and a transition plan to achieve program accessibility
- Performing a self-evaluation of the Agency program and policies to ensure that they do not discriminate based on disabilities.

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## OTHER 504 REQUIREMENTS

- Housing Agency requirements
  - That structures and facilities be barrier free for persons with mobility impairments
  - Effectively communicate with persons with visual, hearing and speaking impairments
  - Modify policies, rules and procedures to accommodate persons with disabilities, so that they can make effective use of the housing program.

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## 504 DOES NOT REQUIRE

- An accommodation that fundamentally changes the nature of the program
- An accommodation requested that is a financial or administrative burden
- There must be an identifiable relationship – nexus -- between the requested accommodation and the individual's disability or handicap (based upon the need).

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## AGE DISCRIMINATION ACT OF 1975

- It is not a violation of the Act to use age distinctions, if they are permitted by statute for particular programs. A federally funded program that provides benefits to the elderly, for example, would not be considered to be operating in violation of the Age Discrimination Act.
  - Elderly only designated buildings

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## QUALITY HOUSING & WORK RESPONSIBILITY ACT – SECTION 591

- The Agency should determine if their programs are eligible to all applicants
  - Language
  - Disability
- The HA should also determine any underserved populations

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## LIMITED ENGLISH PROFICIENCY (LEP)

- HUD Guidance and purpose is to assure that persons with limited English proficiency can effectively participate in federal programs.

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## FOUR FACTOR ANALYSIS

- **Factor 1** – The number or proportion of LEP persons served or encountered in the eligible service population. This would focus on the area of jurisdiction.
- **Factor 2** – The frequency with which LEP persons come in contact with the program.
- **Factor 3** – The nature and importance of the program, activity, or service provided by the program.
- **Factor 4** – The resources available and costs to the PHA

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## FOUR FACTOR ANALYSIS

- Once the local jurisdiction analysis is completed, the agency needs to determine if there is a significant number of LEP residents of a specific language and translation of Documents is required
- If the number of LEP residents is not significant, document translation may not be required. However, translation is required
- The HUD Web-Site has some common documents available in many languages

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## EXAMPLES OF LANGUAGE ASSISTANCE

- Oral interpretation services
- Bilingual staff
- Telephone service lines interpreter
- Written translation services
- Notices to staff and recipients of the availability of LEP services
- Referrals to community liaisons proficient in the language of LEP persons
- Clarify LEP persons who need language assistance and the specific language
- Identify when, where, how contact occurs between agency staff and LEP persons
- Identify ways in which language assistance will be provided

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## VITAL DOCUMENT TRANSLATIONS

- Vital documents include those that are critical and required for eligibility
  - 9886
  - 50058
- Translated documents can be found on the HUD website

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## LEGAL DOCUMENTS & U.S. COURTS

Generally, the English language document prevails and are enforceable in U.S. Courts. HUD recommends that translated documents carry the disclaimer "For Informational Purposes Only." State law should be consulted by the agency concerning legal documents in languages other than English.

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## VIOLENCE AGAINST WOMEN ACT (VAWA) – APPLIES TO BOTH WOMEN & MEN

- Applicants/Residents
  - That an applicant is or has been a victim of domestic violence, dating violence, sexual assault or stalking is not an appropriate basis for denial of housing assistance or for denial of admission of an otherwise qualified applicant
  - An incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence and shall not be good cause for terminating the tenancy or occupancy rights of the victim of such violence
  - Applies to both women and men

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## VIOLENCE AGAINST WOMEN ACT (VAWA)

- Termination of Tenancy/Eviction
  - Criminal activity directly relating to domestic violence, dating violence, sexual assault or staking engaged in by a member of a tenant's household or any guest or other person under the tenant's control shall not be cause for termination of the tenancy or occupancy rights, **if the tenant or affiliated individual of the tenant's family is the victim or threatened victim and declares they are a victim of that domestic violence, dating violence, sexual assault or stalking.**

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**VAWA FINALIZED RULE – EFFECTIVE 12/16/16  
CERTIFICATION OF VAWA STATUS**

- The Agency responding to a claim of protected status under VAWA may request that an individual certify via a HUD-approved certification form that the individual is a victim and that the incident or incidents in question are bona fide incidents of such actual or threatened abuse and meet the requirements set forth in the law.
- Such certification shall include the name of the perpetrator- if known- and does not have fear of retaliatory activities.
- HUD requires a Notice of Occupancy Rights -Form 5380 must be included with future denials of admission, eviction. Existing tenants must receive both forms by 12/16/17

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**A CERTIFICATION FORM 5382 & EMERGENCY TRANSFER PLAN &  
TRANSFER REQUEST PROVISIONS HUD FORMS 5381 & 5383**

- HUD Form 5382 – Section entitled “Use of This Optional Form” in most circumstances, a survivor now can only self-certify in order to exercise their VAWA rights
- HA must comply with “emergency transfer provisions” by 6/14/17
- HUD has provided a Model Transfer Plan and Emergency Transfer Request
- See Forms 5381 and 5382

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**UNDER THE FINAL RULE DEFINITION OF AN AFFILIATED  
INDIVIDUAL**

- CFR 5.2003 (A) defines an “affiliated individual” with respect to the individual, as a spouse, parent, brother, sister, or child of the individual, or a person to whom that individual stands in the place of a parent or guardian.
- For Example: the affiliated individual is a person in the care custody, or control of that individual
- Or, (B) any individual, tenant, or lawful occupant living in the household of that individual

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PIH 2017-02 VAWA SELF-PETITIONER VERIFICATION PROCEDURE

- HUD has determined the self-petitioners can indicate that they are in "satisfactory immigration status" when applying for housing assistance or continued assistance
- "Satisfactory immigration status" means an immigration status which does not make the individual ineligible for financial assistance
- After verifying such status with DHS and using the Systematic Alien Verification for Entitlements (SAVE) system, the HA will make a determination as to the self-petitioner's eligibility for assistance
- Not every noncitizen victim who is subjected to battery or extreme cruelty will qualify under these procedures

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PIH 2017-02 VAWA SELF-PETITIONER VERIFICATION PROCEDURE

- HA may receive a petition at any time, but it will probably be related to an emergency transfer or family breakup resulting from protections under VAWA
- The HUD PIH 2017-02 provides the Agency with clear procedure on the process of verifying the self-petitioner's status
- Public Housing and subsidy assistance requires a household member to be a Citizen or Eligible Immigrant on the lease and 50058. Other household members who do not declare status create a mixed family and assistance must be prorated

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WAITING LIST MANAGEMENT & APPLICATIONS

CHAPTER 4

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## AGENCY POLICY & FEDERAL REGULATIONS

- HA's Application Form is critical in terms of responsible party to the lease. Possibilities include: Head of Household (HOH) or Head and Spouse, Co-Tenants, and/or Sole member
- Application needs to identify the "relationship" of household members
- Federal requirements:
  - **Date and time stamp of applications**
  - **Non-discrimination laws**
  - **The Agency places and selects applicants from the Waiting List based on the policies and procedures identified in the ACOP**

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## WAITING LIST PLACEMENT INFORMATION

- Pre-Application – Abbreviated Version
  - Name(s) and social security number(s) of head of household (co-tenants)
  - Date and Time of application or application identifier (number)
  - Household Type – Family, elderly, disabled, family with a person with disability
  - Unit size – (number, sex and relationship of household/family members)
  - Amount and source(s) of income
  - Preference(s), if any
  - Accessibility requirement, if any
  - Race and ethnicity of the person/household head
  - Contact information – address, phone number
- Formal Application -- Complete Information to Determine Eligibility for certification

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## CENTRALIZED WAITING LIST & BEDROOM SIZE SUB-LISTS OF THE CENTRALIZED LIST

- A Centralized Waiting list – ACOP States the policy on the number and reasons a unit offered can be refused:
  - Number of offers (up to 3)
  - Legitimate reasons for refusal that would not count, such as, hospitalization.
  - Refusal limits and whether the applicant is placed at the bottom of the list or removed from the list.
- Sub-lists, which further break down a waiting list based on:
  - Bedroom size
  - Types of housing
  - Family/Elderly/Disabled household –Age if HA has designated elderly housing
  - Income (targeting and deconcentration)

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## TRANSITIONING FROM CENTRALIZED TO SITE-BASED WAITING LISTS

- Obtain site preferences from current applicants on the Waiting List
- Update the Waiting List by providing all current applicants information about each site and the chance to select one or some number of preferences, where they would accept an offer
- Ability for applicants to “opt” for a “first available” unit offer
- When initial site-based lists are established, all current applicants are informed of the length of each list with an opportunity to change their site selection

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## PREFERENCES

- Housing Agencies may adopt local preferences for selection from the waiting list
- Qualifying for preferences does not guarantee admission
- Benefits of preferences include:
  - The applicant must be otherwise qualified as eligible.
  - Prior to offer of a unit and Lease signing, meet the definition of the preference
  - The preference must be verified

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## EXAMPLES OF PREFERENCES

- Income Tiers (To meet Targeting and Deconcentration)
- Resident Local Preference (Within the entire jurisdiction, including offers to work or train in the jurisdiction. It cannot have a residency time period attached.)
- Elderly or Disabled designated household – HOH, Spouse, Co-Tenants, Sole Member drives this designation
- Household with Persons with Disabilities
- Veterans Preference
- Victims of Domestic Violence

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## EXAMPLES OF PREFERENCES

- Working Preference
- Adult or Head is pursuing education or training
- Involuntary Displacement-government action, declared state or national disaster
- Living in Substandard Housing
- Excessive Cost of Current Housing
- Others

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## MAINTAINING WAIT LIST INFORMATION

- Apply appropriate ACOP "preferences" to applications
- Select applications from the Waiting List sub-lists appropriately for processing, certification
- Date and time stamp are "tie" breakers when two or more applicants have equal status
- Purge and Update the Waiting List (at least annually)
- ACOP and Application Process identify how applicants will be notified when the wait list is purged and number of times contact for up-date and interest are made
- Remove applications from the Waiting List.

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## UPDATING THE WAITING LIST

- Waiting list information should be updated and/or purged periodically
- Updating applicant information will reduce administrative burdens on the Housing Agency
- HAs should consider reasonable accommodations when purging the waiting list

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## OPENING & CLOSING THE WAITING LIST

- Considerations for opening and closing
  - Current number of applicants on Waiting lists/Sub-lists
  - Projected Waiting period by property and bedroom size
  - Current Available unoccupied units
  - If the Waiting List has not been purged in over one year, conduct a purge to reduce Administrative burden before closing the list or sub-list
- List should be purged at minimum once per year to improve property metric on Turnaround Time and track Unit Turnover Rate

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## PREFERENCES

- The Public Housing Authority may adopt local preferences for selection from the waiting list
- Qualifying for preferences does not guarantee admission
- Benefits of preferences include:
  - The applicant must be otherwise qualified as eligible.
  - Prior to Lease signing, meet the definition of the preference
  - The preference must be verified

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## EXAMPLES OF PREFERENCES

- Income Tiers (To meet Targeting and Deconcentration)
- Resident Local Preference (Within the entire jurisdiction, including offers to work or train in the jurisdiction. It cannot have a residency time period attached.)
- Elderly, Disabled or Displaced single person
- Persons with Disabilities
- Working Preference
- Veterans Preference
- Victims of Domestic Violence
- Living in Substandard Housing
- Involuntary Displacement
- Excessive Cost of Current Housing
- Displacement (government declared national disaster)
- Others

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## UPDATING THE WAITING LIST

- Waiting list information should be updated and/or purged periodically
- Updating applicant information will reduce administrative burdens on the agency staff
- The agency should consider reasonable accommodations when purging the waiting list, for example, if an applicant has claimed to be disabled, and the normal policy for response when purging the list is not fulfilled, some extra effort might be made, such as contacting the "emergency contact" given or an organization serving the disabled.

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## REMOVING APPLICATIONS FROM THE WAITING LIST

- Applications can be removed for:
  - The applicant is housed
  - The applicant refuses unit offers with "good cause"
  - The applicant is denied admission because Eligibility Criteria are not met
  - The applicant requests that their application be removed from the list

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## REMOVING APPLICATIONS FROM THE WAITING LIST

- The applicant is denied admission because they did not respond to an update request
- The Agency made reasonable attempts to contact the applicant without success
- The applicant fails to keep scheduled interview appointments
- The applicant fails to respond to the LHA concerning information that is necessary to process and certify the application or maintain the Waiting List

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**PROCESS FOR PROJECTING ELIGIBLE APPLICANTS**

- Trending property/unit turnover by Property/AMP
- Identifying ratios of acceptance and refusal by applicants
- Maintaining an appropriate number of Certified applicants
- Designing a method that improves the probability that Certified Applicants will accept the unit offer
- Identify "bottlenecks" and work toward process improvement initiatives

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**OCCUPANCY FUNCTION & LEASE**  
CHAPTER 5

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**ELIGIBILITY & LEASE ENFORCEMENT: IMPACT ON INCOME & EXPENSES, RESIDENT SATISFACTION & STAFF PRODUCTIVITY**

- The Federal Regulatory requirement for Applicant eligibility includes screening for criminal activity and "Behavior as a Tenant"
- The Lease contract is the legal relationship between the Agency and the Resident/Tenant
- Without an effective objective and defensible screening process, Lease enforcement is a challenge and impacts the property's financial and marketable viability

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## INCOME & EXPENSES

- Public Housing is not an entitlement
- Resources for assistance are limited
  - Rental income must be shown to be sufficient to cover property expenses
- Property/AMP budgets need to consider both rental/subsidy income and expenses. Typically an agency may only focus on reducing expenses, increasing income should also be considered.
  - Staffing
  - Maintenance

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## ELEMENTS EFFECTING RESIDENT SATISFACTION

- Neighbor behavior,
- Staff's ability to respond timely to service requests,
- Quality of materials used,
- Staff's skill and customer service tone, and
- Perception and image of where they live by the community at large.

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## EXAMPLES OF PROPERTY CONDITIONS THAT IMPACT STAFF PRODUCTIVITY

- Properties with significant deferred maintenance
- Systems/processes within the organization or jurisdiction that are unsupportive of screening and lease enforcement
- Lack of technology
- Lack of critical thinking in improving agency system and processes to be more responsible to the property and residents.
- Lack of training of agency staff
- Lack of communication and setting standards for performance
- Creating and sending rent demand notices to a significant number and/or the same residents every month

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### EXAMPLES OF PROPERTY CONDITIONS

- Documenting and following Due Process to move on an eviction and lose in court, based on the court's emotions rather than facts
- Time consumed dealing with the challenges of repeated lease violations like failure to pass housekeeping inspections
- Re-work, maintenance materials and time to repeatedly repair resident damage
- Preserving curb appeal by using staff time to collect trash on the property
- Dealing with resident complaints about neighbors
- Failing to comply with recertification

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### HOW OCCUPANCY IMPACTS MAINTENANCE & HOW MAINTENANCE IMPACTS OCCUPANCY

- Vacant apartment preparation (VAP)
- Turnaround time on vacant units
- Volume of work on both emergency and general service requests
- Turnover Rate, reflecting the rate of move-outs
- Ability of the Property Manager to protect the property's physical condition
- Rental Income loss and, possibly, subsidy losses due to vacant units

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### PROPER SAFETY & SECURITY

- A Housing Agency can be liable for safety and security issues. But it also affects property marketability.
- Basic Safety and Security Problems:
  - Opening lobby doors to strangers
  - Unwillingness to dial 911 when observing crime
  - Permitting household members and guests to engage in drug use or other criminal activity
  - Creating an environment within the unit that is unsafe or unsanitary
  - Removing batteries from smoke detectors
  - Providing keys to others
  - Resident's fear they will get "in trouble" if they squeal or complain

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### THE ACOP SHOULD INCLUDE

- Adopt written Admission policies
- Targeting requirements to address “those most in need”
- Deconcentration of poverty and mixing incomes in properties
- Precluding admission of applicants whose past habits and practices may reasonably be expected to have a detrimental effect on the residents and on the project’s environment
- Objective and reasonable policies for selection, and verification/documentation relevant to acceptance for tenancy – including citizenship or eligible immigrant status
- Transfer policies for movement of current residents between properties or programs

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### LEASE REQUIREMENTS

- The Housing Agency is bound by federal, State and local laws, including “landlord/tenant law”
- There are times when a conflict in federal law and State law will occur.
- The lease is a contract that establishes the basic legal relationship between the HA and the Resident/Tenant
- The Lease is a resource for the ACOP, in terms of screening and selection standards as related to “behavior as a tenant”

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### REQUIRED LEASE PROVISIONS

- The lease must state that additions to a tenant household other than births, adoption, or court-awarded custody require the family to request PHA permission prior to permitting anyone not listed on the lease to occupy the unit (24 CFR § 966.4 (a)(v)).
- The lease term must be one year, renewable for subsequent one year terms (many PHAs had month-to month leases or month-to-month renewals) (24 CFR § 966.4 (2)(i)).

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## REQUIRED LEASE PROVISIONS

- The lease must contain a clause stating that PHA may not renew the lease if the family has violated the requirements to perform community service or economic self-sufficiency activities (24 CFR § 966.4 (2)(ii)).
- Although it is for one year, the lease may be modified at any-time by written agreement of the tenant and the PHA (24 CFR § 966.4 (3)).
- Failure by a tenant to accept a lease revision is grounds for termination of tenancy (24 CFR § 966.4 (1)(2)(i)).

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## REQUIRED LEASE PROVISIONS

- The HA must waive the escrow deposit for a grievance hearing if it is requested in connection with a minimum rent hardship exemption (24 CFR § 966.55 (e)(2)).
- The prohibition (in many HA leases) against pets in family developments must be revised to permit pets, in compliance with the HA's pet policy.
- The lease should reference any changes in annual and interim re-examinations contained in the ACOP.
- The HA lease language has been strengthened and made more explicit on termination of tenancy for criminal activity or alcohol abuse.

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## PROHIBITED PROVISIONS

- Confession of judgment;
- Distraint for rent or other charges -
- Exculpatory clauses
- Waiver of legal notice by tenant prior to actions for eviction or money judgments
- Waiver of Jury Trial
- Waiver of right to appeal judicial error

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## LEAD-BASED PAINT PROVISIONS

- Families must be notified of the potential for lead-based paint
- Have them sign at the time of move-in and place information in the resident file

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## NOTIFICATION TO RESIDENTS

- Pamphlet & Disclosure
- Notice of Lead Evaluation
- Notice of Hazard Reduction
- Evaluation
- Visual Assessment



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## OPTIONAL PROVISIONS

Types of optional provisions include:

- Late payment penalties
- Types of payment
  - Cash
  - Check
  - Money-order
- Security deposit
  - Amount and collection
  - May be governed by state laws

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## RELATIONSHIP OF THE PUBLIC HOUSING LEASE TO OCCUPANCY POLICIES

- Make sure occupancy policies and the lease are consistent
- Basic elements that the PHA should check:
  - Rents and other charges
  - Required agency permission to admit adults to the household
  - Transfers
  - Rent adjustments (Recertification/Interims)
  - Utilities
  - Rent collection Process/Procedure
  - Community service requirement

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## FEDERAL LEASE REQUIREMENTS

- Identify Parties, Identify Dwelling Unit and Term
- Payments Due
- Redetermination of Rent and Family Composition
- Tenant's Right to Use and Guests
- Running a Business From the Unit
- Tenant Obligations and HA Obligations

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## FEDERAL LEASE REQUIREMENTS

- Notices
- Reasons for Termination of Tenancy and Eviction
- Terminations for Criminal Activity
- Grievance Procedures
- Posting of Policies, Rules and Regulations and Schedules

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SCREENING & SELECTION & THE LEASE RESIDENT OBLIGATIONS:  
EXAMPLES

- Keep the unit and other assigned areas in a clean and safe condition
- Pay reasonable charges(not wear & tear) for the repair of damages
- All household members and guests act in a manner that will not disturb other tenants enjoyment of accommodations
- No member or guest engage in drug related criminal activity on or off the premises, including a pattern of abuse of alcohol impacting health, safety and peaceful enjoyment by other tenants

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ELIGIBILITY REQUIREMENTS & APPLICATION  
POLICIES & PROCEDURES

CHAPTER 6

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SEVEN FEDERAL ELIGIBILITY REQUIREMENTS OF OCCUPANCY IN  
PUBLIC HOUSING

- The applicant must be determined to be a Family under federal regulations and local policies.
- Family must meet the HUD Schedule of income limit guidelines for family size. Capped at 80% of AMI for the jurisdiction
- The PHA must have a unit of appropriate size in its inventory
- Family members must be citizens, or non-citizens with *eligible immigrant* status, as defined under federal requirements, and/or be a "Mixed Family."

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**SEVEN FEDERAL ELIGIBILITY REQUIREMENTS OF OCCUPANCY IN PUBLIC HOUSING**

- Applicant must provide Social Security Numbers for all family members that are eligible.

An exception applies in the case of a Mixed Family where one or more household members have not claimed eligibility and cannot furnish Social Security Numbers.

PIH-Notice 2016-05 applies to applicants with children under the age of 6 who do not have or can verify and document a valid SSN for the child. It is mandatory that the Agency give them a 90 day extension to provide such documentation and provides, if merited an additional 90 days. The lack of verified SSN for the child under the age of 6 is not a reason for denying eligibility

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**SEVEN FEDERAL ELIGIBILITY REQUIREMENTS OF OCCUPANCY IN PUBLIC HOUSING**

- The applicant and adult household members must pass criminal checks as provided by both federal regulations and by the HA's ACOP and procedures.
- Applicant household must pass screening and selection criteria assessing their potential behavior as a tenant, as described in federal regulations and in accordance with HA's ACOP and procedures. (Subpart B 960.202 & 203)

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**FAMILY DEFINITION 24 CFR 5.403**

- Each applicant must meet the definition
- Guidelines provided by HUD
- PHA has discretion but must include HUD as a minimum

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## FAMILY DEFINITION

- Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the following:

(1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or

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## FAMILY DEFINITION

(2) A group of persons residing together, and such group includes, but is not limited to:

- (a) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
- (b) An elderly family;
- (c) A near-elderly family;
- (d) A disabled family;
- (e) A displaced family; and
- (f) The remaining member of a tenant family.

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## INCOME DEMOGRAPHICS & ADMISSIONS

- Lower-Income Limit – Not to exceed 80% of AMI
- Very-Low Income – Not to exceed 50% of AMI
- Extremely Low-Income – Not to exceed 30% of AMI
- **40% of all new admissions based on annual turnover must be Extremely Low-Income**

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**TYPES OF INCOME & EXAMPLES**

Regulation	Example
Gross wages and salaries, overtime pay, commissions and fees, tips, bonuses.	A construction worker's gross salary and overtime pay; a hairdresser's salary and tips; a clerk's gross salary and commissions; a waiter's gross salary and tips.
Net income from the operation of a business; an allowance for depreciation of assets may be deducted using the straight line method provided by IRS	A lawn service owner's income after deductions for operating expenses such as grass seed and gasoline.
Interest, dividends, net income from real or personal assets.	Dividends on stock; interest in passbook saving accounts; interest on certificates of deposit; net income after expenses for rental of a property.

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**TYPES OF INCOME & EXAMPLES**

Regulation	Example
When the family net assets are in excess of \$5,000, annual income includes the greater of actual income derived from the assets or a percentage of the value of such assets based on the current passbook savings rate as determined by HUD.	Land, cash on hand, real estate.
The full amounts of periodic payments received from Social Security annuities, insurance retirement funds, pensions, disability or death benefits, similar types of periodic receipts.	All Social Security payments to any family member; a state employee's pension or retirement; a widow's insurance benefit.

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**TYPES OF INCOME & EXAMPLES**

Regulation	Example
Payments in lieu of earnings.	Unemployment benefits; workman's compensation; severance pay; AFDC; general welfare assistance.
Periodic and determinable allowances	Alimony, child support; payments; the regular and consistent amount a child may give to a parent each month.
All regular pay, special pay, and allowances of a member of the armed forces, whether or not living in the units, who is head, spouse, or other person whose dependents are residing in the unit.	The salary of a spouse presently at sea with the Navy; the salary of a family member on the lease (i.e., a daughter) stationed with the Army in Germany when her mother is taking care of her children.

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## TYPES OF INCOME & EXAMPLES

Regulation	Example
The amount of a welfare allowance or grant, exclusive of the amount specified for shelter and utilities. If the family's grant is ratably reduced from the standard of need by a percentage, the amount used will be the amount resulting from one application of the percentage.	In some states, the welfare grant is divided into subsistence and an amount specifically designed for shelter and utilities.
Assets disposed of within two years of the admission or certification date for less than market value, with some exceptions.	Selling a house for a dollar when the market value is \$25,000.

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## TYPICAL ANNUAL INCOME EXCLUSIONS

- Income from employment of children (including foster children) *under* age 18.
- Payments received for the care of foster children or foster adults. Foster adults are usually persons with disabilities, unrelated to the tenant's family, who are unable to live alone.
- Lump-sum additions to family assets, unless invested then it is treated as an Asset.

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## TYPICAL ANNUAL INCOME EXCLUSIONS

- Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
- Income of a Live-in Aide.
- The full amount of student financial assistance paid direct to the student or to the educational institution, exception in Public Housing, that portion of an Athletic scholarship earmarked shelter/housing.
- The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.

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### TYPICAL ANNUAL INCOME EXCLUSIONS

- Amounts received under training programs funded by HUD.
- Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits, because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).

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### TYPICAL ANNUAL INCOME EXCLUSIONS

- Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred
- Incremental earnings and benefits resulting to any family member from participation in qualifying state or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program.

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### TYPICAL ANNUAL INCOME EXCLUSIONS

- Temporary, nonrecurring or sporadic income (including gifts).
- It would be in the PHA's interest to clearly define "temporary, nonrecurring and sporadic" income in their ACOP. This should not be confused with Law that counts as income payments (Monetary/non-monetary) from someone not a member of the household received on some periodic basis, e.g., weekly, monthly, annually, etc.

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## TYPICAL ANNUAL INCOME EXCLUSIONS

- Earnings in excess of \$480 for each Full-time Student 18 years old or older (excluding the head of household and spouse).
- Adoption Assistance Payments in excess of \$480 per adopted child.
- Each year check for other “exclusions” as often there are additions

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## OCCUPANCY STANDARDS

- HUD does not have specific requirements for bedroom sizes. HUD's guideline is 2 persons per bedroom.
- The PHA should define their limits within their ACOP and avoid overcrowding situations
- Examples: Things to consider for occupancy standards
  - Unit sizes, sq. ft. area, closet/storage
  - Local area standards
  - Age of unit and property infrastructure capacity
  - Age and sex of individuals

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## ELIGIBLE IMMIGRANT STATUS TO QUALIFY FOR ELIGIBILITY & RECEIVE SUBSIDY

- Lawfully admitted for permanent residence as an immigrant, including special agricultural workers;
- Entered the U.S. before January 1, 1972 and has maintained continuous residence thereafter, and who is not ineligible for citizenship, but who is deemed to be lawfully admitted for permanent residence as a result of an exercise of discretion by the Attorney General;

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**ELIGIBLE IMMIGRANT STATUS TO QUALIFY FOR ELIGIBILITY & RECEIVE SUBSIDY**

- Lawfully present in the U.S. pursuant to the granting of asylum (refugee status);
- Lawfully present in the U.S. as a result of an exercise of discretion by the Attorney General for emergent reasons or reasons deemed strictly in the public interest (parole status);
- Lawfully present in the U.S. as a result of the Attorney General's withholding deportation (threat to life or freedom);
- Lawfully admitted for temporary (may expire) or permanent residence

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**ELIGIBLE IMMIGRANT STATUS TO QUALIFY FOR ELIGIBILITY & RECEIVE SUBSIDY**

- **NOTE: Determination if an applicant or household member is claiming "Eligible Immigration Status" must be verified through Homeland Security/INS**
- **Any household without a Citizen or Eligible Immigrant Status member is not eligible for occupancy**

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**SOCIAL SECURITY NUMBERS**

- Valid Social Security Numbers must be disclosed and verified as valid for all applicant household members. Children under the age of 6 may need a 90-day extension (PIH – 2016 – 05)
- Verification is required by viewing the original card issued by the Social Security Administration, or original documentation by a federal, state, or local governmental source

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## SOCIAL SECURITY NUMBERS

- Applicants and household members, other than those with children under the age of 6 must be denied for failure to provide verification of their SSN
- *Mixed families are not required to provide SSN for household members that do not declare eligibility*

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## BASIC SCREENING

- Applicant/Household's *willingness and ability* to keep the unit clean, safe and sanitary.
- Has the applicant ever violated health or safety codes?
- Was there any damage done by the applicant household at current or previously properties, and if so, how much repair or damage cost, and were they paid by the applicant?

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## BASIC SCREENING

- Has the applicant's housekeeping caused insect or rodent infestation in the past?
- Is there a record of neighbor complaints or police calls due to disturbance to neighbors?
- Did previous landlords return the security deposit?
- *Housing Agency may want to conduct a home visit to an applicant's current residence*

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### COLLECTING DATA FOR TENANT BEHAVIOR & FINANCES

- Credit Report and others -- utility providers, checking account history, etc., Private up-front electronic private providers
- Current or previous landlord(s) or shelter provider verification via third party, using the agency's designated verification form.
- Alcohol-related behavior that threatens the health, safety or right of peaceful enjoyment of the property by other residents.
- Additional landlord contact at the discretion of the Agency.
- ACOP may include language that permits the HA to investigate information received from sources that the HA did not request
- Current Home Visit

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### PAST PERFORMANCE IN MEETING FINANCIAL OBLIGATIONS FOR RENT

- Request information from the current landlord, at least one prior landlord, and utility suppliers. Agency may require in their ACOP that the Head of Household be able to secure utilities in their name
- Credit reports and checks are used to evaluate an applicant's financial history and determine current debt in relation to income reported
- Financial screening can require that an applicant who was previously served by assisted housing and owes balances, be required to pay the balance before being placed on the waiting list

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### HUD 9886 – AUTHORIZATION FOR RELEASE OF INFORMATION

- All adult members age 18 and over must sign HUD 9886
- Failure to sign is grounds for denial or termination
- The purpose is for release of information from:
  - State Wage Information Collections Agencies (SWICA)
  - U.S. Social Security Administration (via HUD only)
  - U.S. Internal Revenue Service (via HUD only)
  - Other income sources which the agency can contact directly

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**IMPACTS OF IMPROPER SCREENING FOR ELIGIBILITY**

- Fraud
- Housing ineligible applicants
- Discrimination
- Safety of residents and employees
- Negative impact on the viability of the agency's property – Marketability/Financial status (Cash flow)
- Negative image in the community

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**IMPACTS OF IMPROPER SCREENING FOR ELIGIBILITY**

- Increased expenses at the property
- Possible increase in property insurance costs
- Increased turnover time
- Increased turnaround time and costs
- Legal costs, suits and evictions

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**CRIMINAL BACKGROUND**

- Must be conducted on all members 18 and older
- The process should include:
  - Identify where this information will be obtained – local, state, federal sources, private vendor – and the type of documentation to be obtained
  - Identify which results will disqualify the Head/Co-head of household or other adult household members, e.g., eviction for drug activity from assisted housing

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## CRIMINAL BACKGROUND

- Identify whether any household member is currently engaging in the use of an illegal drug. "Currently" is identified as engaging within the last six months, or demonstrating a pattern of use that might threaten the health, safety or right to peaceful enjoyment of the property by other residents.
- Identify seriousness of criminal activity. A weighting scale could be used.
- Identify time frames, for example within the past seven years.
- Identify time frames and documentation required for the household to demonstrate to the agency *successful rehabilitation*.

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## DENIAL FOR CRIMINAL BACKGROUND

- The agency is required to prohibit admission of families with members who were evicted from any federally assisted housing for drug-related criminal activity for three years following the date of eviction.
  - Unless the family can demonstrate that particular person is no longer a family member or been rehabilitated (Discretionary)
  - 3 years is the federal minimum (ACOP can be more)
- Members who are currently engaging in illegal use of a drug.
- Members who have shown a pattern or history of use of alcohol, illegal drugs or other criminal activity that may interfere with the health, safety or right to peaceful enjoyment of the premises by other residents.

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## DENIAL FOR CRIMINAL BACKGROUND

- Member who is subject to a lifetime registration requirement under a state's Sex Offender Registration Program.
- Members whose abuse of alcohol, or pattern or history of abuse of alcohol, would interfere with the health, safety or right to peaceful enjoyment of the premises by other residents.
- Member who has ever been convicted of drug-related criminal activity for manufacture of methamphetamine on the premises of federally assisted housing.

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### RECOMMENDATION OR DENIAL OF ADMISSION

- PIH Notice 2015-19 HUD has determined for various reasons that the Housing Agency may not base denial of an applicant or eviction of a household solely on an arrest or number of arrests. The agency's screening must show a "preponderance of evidence" and basing the decision only on an arrest does not meet that standard
- Criminal activity denials must be notified in writing
- Missing information should be obtained and verified
- The HA should have policies in place for informal reviews based on denials and mitigating circumstances
  - Mitigating circumstances are not an excuse, but they should be taken into consideration

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### RECOMMENDATION OR DENIAL OF ADMISSION

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### PERSONS WITH DISABILITIES

- The nature of the disability should not be requested, but verification of the disability should be documented. The ACOP can require that the document be signed by a licensed health care professional
- If a person with disabilities cannot meet essential lease requirement behavior they may be denied
  - Criminal background
  - Life-time sex offender
  - Having rent payment issues
  - Ability to maintain the unit – safe and sanitary (unless they can provide documentation of their ability to pay or obtain assistance in these lease requirements)

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## APPLICATION IMPACTS FOR PERSONS WITH DISABILITIES

- Every applicant/household should be asked whether the applicant or any household member is a person with a disability.
- Apply standard screening standards and criteria. Should the applicant/household demonstrate alignment with the screening criteria, no further reference or consideration of the disability is necessary.
- If there are mitigating circumstances, an interview can determine whether applying reasonable accommodation would permit admission.

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## POSSIBLE REASONABLE ACCOMMODATIONS

- Elimination of barriers to housing the applicant (physical modification) – placement in a property unit that is barrier free.
- Policy or Procedure changes – approval of a larger unit to accommodate necessary equipment attributed to the disability.
- Occupancy of a live-in-aide there to assist the applicant with some aspect of lease compliance that the applicant could not otherwise achieve.

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## BASICS OF REASONABLE ACCOMMODATION

- *By law, accommodation, to be considered reasonable, must not cause undue financial or administrative burden, or alter the fundamental nature of the agency's public housing program.*
- *If there is a service necessary for compliance with the lease, the agency should consider the facts and nexus-the relationship.*
  - For example, a person with an hearing impairment requesting a ramp would not be reasonable

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## VERIFICATION OF ELIGIBILITY & APPLICANT STATUS

- A very significant amount of information in HUD's Enterprise Income Verification (EIV) electronic data cannot be accessed for Applicants.
- You can check if they are currently receiving some form of assisted housing
- Third Party written means it does pass through the hands of the applicant, Third party oral requires agency staff to orally verify with the income source and document the file.

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## VERIFICATION OF ELIGIBILITY & APPLICANT STATUS

- There are some exceptions, such as recent, consecutive pay stubs, original SS benefit award letters, birth certificates and original social security cards
- Agency should consider the use of private "Upfront Income Verification" UIV, such as credit reports and vendors who can provide such information. The applicant cannot be charged for the cost of these types of electronic verifications
- Many required verifications are not available via UVI, such as, assets, monetary support from persons outside the household, etc.

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## APPLICANT - NEW ADMISSION - REQUIREMENT

- Review the EIV Income Report to confirm/validate family-reported income within 120 days of the PIC submission date; and
- Print and maintain a copy of the EIV Income Report in the participant file; and
- Resolve any income discrepancy with the family within 60 days of the EIV Income Report date.

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**HUD REGULATION - 24 CFR 5.233  
- RESIDENT RECERTIFICATION & INTERIMS**

- A Public Housing Authority must use all features of EIV to:
  - Verify participant employment and income information during mandatory reexaminations of family composition and income
  - Reduce administrative and subsidy payment errors in accordance with HUD guidance

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**VERIFICATION HIERARCHY - CHANGED**

Level	Verification Technique	Ranking
6	Upfront Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system (not available for income verifications of applicants)	Highest (Mandatory)
5	Upfront Income Verification (UIV) using non-HUD system	Highest (Optional)
4	Written third Party Verification and can be applicant/tenant hand carried original documents from a third party source, for example: Social Security Award Letter, Original Pay Stubs	High (Mandatory to supplement EIV-reported income sources and when EIV has no data; Mandatory for non-EIV reported income sources; Mandatory when participant disputes EIV-reported employment and income information and is unable to provide acceptable documentation to support dispute)

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**VERIFICATION HIERARCHY - CHANGED**

Level	Verification Technique	Ranking
3	Written Third Party Verification Form	Medium-Low (Mandatory if Level 4 written third party verification documents are not available or rejected by the PHA; and when the applicant or participant is unable to provide acceptable documentation). Or if EIV information is in dispute
2	Oral Third Party Verification	Low (Mandatory if written third party verification is not available)
1	Participant Declaration	Low (Use as a last resort when unable to obtain any type of third party verification)

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## UPFRONT INCOME VERIFICATION (UIV)

- Independent source that systematically and uniformly maintains income information
- EIV is available to all PHAs
- EIV is a UIV technique (Level 6)
- Other sources that the agency are encouraged to use
  - State databases- (Level 5)
  - The Work Number (an automated verification system)- Private vendor providers (Level 5)

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## WRITTEN THIRD PARTY VERIFICATION (LEVEL 4)

- Original or authentic document generated by a third party dated within a 60 day period preceding the reexamination or PHA request date
- Documents may be possession of the participant
  - **This is now considered third party written if originated from a third party**
- PHA may reject participant-provided documents and follow-up with the source directly

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## REVIEW & DOCUMENTATION OF ORIGINAL DOCUMENTS CONSIDERED AS "THIRD PARTY"

- *Document review examples:*
  - Most recent, consecutive & original pay stubs
  - Original Bank statements Award letters or statements
  - Original Social Cards/Birth Certificates
  - Social Security original award letters with codes
  - Child support payment (cancelled checks from provider and/or award confirmation from courts or other reliable source-social worker)
  - IRS tax forms, W-2, CPA or Vendor prepared Form 1099, Form 1040, Form 4506 & 8821

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### WRITTEN THIRD PARTY VERIFICATION FORM (LEVEL 3)

- Known as traditional third party verification
- Uses a standardized form to collect information
- PHA's send the form directly to the third party source
  - Mail
  - Fax
  - Email
- PHA administrative burden is often increased with this method
- HUD has lowered the level of this type of verification
  - Often not returned
  - Less accurate or incomplete

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### ORAL THIRD PARTY VERIFICATION (LEVEL 2)

- Verification via, telephone or in-person visit
- PHA should document in participant file
  - Date
  - Time
  - Person verifying the information
    - Name
    - Telephone number
    - Contact information
    - Confirmed information

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### APPLICANT / RESIDENT DECLARATION (LEVEL 1)

- Applicant/Resident submits an affidavit or notarized statement
- Should only be used as a last resort when Agency has not been successful with other methods
- The PHA should document why other third party verification was unavailable

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## HISTORICAL ADJUSTMENT - RECERTIFICATION OR INTERIM ADJUSTMENT

- Review the EIV Income Report to confirm/validate family-reported income within 120 days of the PIC submission date; and
- Print and maintain a copy of the EIV Income Report in the participant file; and
- Resolve any income discrepancy with the family within 60 days of the EIV Income Report date.

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## REQUIREMENTS ON USING REPORTS

- Public Housing Authorities are required to monitor the following EIV reports **monthly**:
  - Deceased Tenants Report
  - Identity Verification Report
  - Immigration Report

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## NEW REQUIREMENTS ON USING REPORTS

- Housing Agencies are required to monitor the following EIV Reports on a **quarterly** basis:
  - Multiple Subsidy Report
  - New Hires Report

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**BASIC STEPS FOR QUALIFYING**

- Does the family meet local and federal definitions?
- Does the applicant meet applicable income standards as defined by HUD?
- Is there a unit of appropriate size available for this family?
- Does everyone declaring eligibility have a verifiable Social Security Number?—except those under age 6 with 90 day extension

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**BASIC STEPS FOR QUALIFYING**

- Has applicant family been determined to meet the citizen or non-citizen eligible immigrant federal requirements?
- Does the family pass the criminal/drug background screening?
- Has family history demonstrated that family passed other screening criteria per the Agency Occupancy Policy and standards?

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**INTERVIEWING APPLICANTS & RESIDENTS**  
CHAPTER 7

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## FREQUENT BARRIERS TO APPLICANTS

- Limited English Proficiency requirements
- Reasonable Accommodation for applicants with disabilities
- Literacy issues
- Technical assistance, sight, hearing, (other accommodation)

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## WHAT IS THE PUBLIC HOUSING AGENCY'S FIRST CONTACT WITH APPLICANTS?

- How are telephone calls handled, especially general inquiries about the public housing program and rental properties?
- If there is an automated phone system, is there a specific message that provides general information? Are there prepared information packets available?
- Is the automated phone system effective, or do people "get lost in the maze?"
- What is the environment of the general reception area where applications can be completed, and the waiting area for persons scheduled for interviews?

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## FIRST CONTACT

- Is there privacy provided for completing applications and for interviews?
- Has staff been trained or coached in customer service?
- Has staff responsible for answering inquiries, taking applications, or interviewing been trained in effective interpersonal communication skills?
- Has the staff been trained to deal with difficult customer situations, and learned effective conflict resolution skills?
- Does either a performance criterion or work load perspective, give staff sufficient time to conduct quality interviews with applicants?
- Are customer service surveys taken from time to time?

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## APPLICATION & CERTIFICATION INTERVIEWS

- Certification interviews provide essential verification information and provide an opportunity to develop relationships with applicants/residents
- *Much of the information gathered at interviews is protected under the Privacy Act*

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## INTERVIEW IS CRITICAL

- Requires HA staff to conduct a thorough interview
- Initial interview sets the groundwork for future interim/annual recertification interviews
- Purpose is to obtain complete and accurate household income information
- Objectively give information, explain process including what will be verified and how.

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## BASIC INTERVIEWING PITFALLS

- Viewing the interview as monotonous and mechanical.
- Not recognizing the diverse fears of interviewees, such as having to ask for assistance, providing personal information to a stranger, or a fear of being judged.
- The interviewer is unaware that they may interpret others in terms of themselves, thus forgetting that their views are influenced by their own biases and emotions.
- 93% of communication is reflected in facial expression, tone of voice, body language. Words are 7%.

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## REALITIES OF AN INTERVIEW

- Staff are not robots, but beware of interjecting opinion into a situation.
- Interviewees might have different beliefs and values
- Follow the Facts!
- Eligibility for admission should be objectively fixed

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## PITFALLS OF SUBJECTIVITY

- While opinions are important, they can also lead to problems with denial of otherwise eligible applicants and could also lead to FHEO issues
- Be consistent and follow the facts!

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## BASIC FOR INTERVIEWS

- Review the informal or formal application or the resident's file.
- Be prepared to greet the applicant or resident by name.
- If you have not met the person or this is the first encounter, introduce yourself. Consider a professional handshake.
- "Break the ice," to put the person at ease.
- Be prepared to clearly state the purpose of the interview.
- Clarify the time frame required.

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## BASICS FOR INTERVIEWS

- Have your required questions and forms organized and available.
- Make sure you make eye contact from time to time.
- Make sure you explain the "rules of the game." For example, use of third party or EIV verifications, automated data matching, contact with credit report vendor, and previous landlords, and criminal checks.
- Be sensitive to the use of "technical acronyms and language," for example, EIV, and Assets.

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## BASICS OF THE INTERVIEW

- Be sensitive to possible literacy or LEP issues when asking the person to sign documents.
- Find ways to keep the person engaged in the interview. For example, consider using Active Listening protocols to make sure they are understanding the information you are giving, and the information you are asking them to disclose.
- At the close of the interview, clarify next steps and time frames.
- Thank the person for their cooperation and time.

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## PURPOSE OF THE INTERVIEW

- Identify Information that must be verified
- Type of verification methods that will be used by the PHA for applicants and residents (and including computer matching)
- Require all family members 18 years of age or older to sign a consent form to authorize the release of information
- Applicant and resident responsibility to provide information and documents at the request of the agency, for all interviews: Initial certification, recertification and Interim recertification policies
- Rent Policies - Minimum Rents, Income-based rents and Flat Rents

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**INTERVIEW & VERIFICATION POLICIES & PROCESSES FOR APPLICANTS & RESIDENTS**

- General Policies in ACOP should include:
  - What must be verified
  - Types of verification accepted and used, required Agency forms for Third Party verification
  - Requirement to sign release forms
  - Applicant's/Tenant's responsibility to provide documents
  - Minimum rent requirements
  - Interim and Re-examination procedures and requirements

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**INTERVIEWER'S KNOWLEDGE OF REQUIRED INCOME INFORMATION FOR NEW & CURRENT RESIDENTS**

- Staff needs a thorough understanding of what constitutes income -- monetary and non-monetary
- Staff should not make assumptions about whether someone may or may not have a particular type of income
  - E.g., family without children may be receiving child support back payments

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**ACOP MUST IDENTIFY THE REQUIREMENTS FOR RELEASE OF INFORMATION**

- To obtain verifications, The agency must obtain a release of information from the family member whose information is being requested
  - HUD Form 9886 (document required)
  - Agency verification request forms for specific types of information not covered by the HUD 9886, e.g. assets, child support, etc., should include a section with a release of information required signature for the applicant or resident

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## HUD-9886 SIGNED BY ALL HOUSEHOLD MEMBER OVER 18

- HUD-9886 may only be used for verification sources listed on the form
- Authorizes HUD only to obtain third party from SSA and IRS
- Valid for 15 months from date of signature. Continued occupancy requires updated signatures

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## LEGAL REGULATORY REQUIREMENTS FOR VERIFICATION

- 24 CFR 960.259 (c)(1) and 982.516 (a)(2)
- Must document
  - Annual income
  - Expenses related to deductions
  - Other factors that determine eligibility, wait list position, deductions or an income-based rent
  - Family composition

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## MANDATORY STREAMLINING REQUIREMENTS - PUBLIC HOUSING

- Verification of Social Security Numbers for applicant households with dependents under the age of 6
- Provides for 90 day period after admission to supply SS numbers for those under the age of 6
- Allows for an additional 90-day extension if merited due to circumstances outside the families control

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TRANSFERS  
CHAPTER 8

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TYPES OF TRANSFERS & PRIORITIES

- Emergency Defined in ACOP (Fire, Water, LBP,VAWA, etc..)
- Reasonable Accommodation
- Demolition, Disposition, Revitalization or Rehabilitation
- Occupancy Standards
- Split Family Transfers
- Incentive
- Resident-initiated (ACOP should specify types of resident request that do not qualify
- Emergency transfers Highest priority, and agency should establish a hierarchy of priorities in the ACOP

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PROCESSING & COST OF TRANSFER

- ACOP describes transfer process, mandatory and requested by resident
- Agency may use transfers to satisfy deconcentration requirements
- The HA will bear the reasonable cost of transfers they initiate - including 504
- These costs may include:
  - Moving, packing, disconnecting/reconnecting resident paid services, such as, cable telephone, etc.

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ANNUAL REEXAMINATIONS  
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QUALIFICATIONS FOR CONTINUED OCCUPANCY

- Qualify as a family
- Full compliance with the lease. The lease is a 12 month term
- SSN for household members that declare eligibility
- Family should meet HUD defined citizenship, Eligible Immigrant, mixed household rules
- Be in compliance with community service

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INFORMATION FOR ANNUAL RECERTIFICATION

- Family composition;
- Age of family members;
- Annual income and sources of income of all family members;
- Deductions for computing adjusted income;
- Assets;
- Community Service and economic self-sufficiency activities and exempt status of all family members over age 18;
- Social security numbers for any new family members; and
- Citizenship or eligible immigrant status of any new family members.

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## OPTION TO USE ACTUAL PAST INCOME

- Simplify Process
- Use Last Years Income for Annual Income Calculation
  - Actual income received or earned in past 12 months
  - **Must use EIV for Verification**
- **Must use the same period for wage and non-wages**

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## TENANT DISPUTES OR CHANGE IN CIRCUMSTANCES

- Agency will provide for adjustments for tenant disputes or changes
  - Loss of employment
  - Reduction in hours
  - Changed jobs
  - Etc.
- Agency will need verification- pay stubs, third party, etc.

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## BASIC REEXAMINATION PROCEDURES

- Many HAs require adult members of the household to sign an application for continued occupancy and other forms required by HUD
- Employment, income, allowances, Social Security numbers, and such other data appropriate for the family's circumstances must be verified, and all verified findings must be documented and filed in the resident's folder. A credit check may be run on each family at the time of reexamination to help detect any unreported income, family members not reported on the lease, etc. (24 CFR § 960.259).

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## BASIC REEXAMINATION PROCEDURES

- Residents with a history of employment whose regular reexamination takes place at a time when they are not employed must have their income calculated based on their past and anticipated employment. Residents with seasonal or part-time employment of a cyclical nature must be asked for third party documentation of the circumstances of their employment including starting and ending dates.
- Income shall be computed in accordance with the definitions and procedures set forth in HUD regulations (24 CFR Part 5).

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## RECERTIFICATION FOR CONTINUED OCCUPANCY

- Public Housing Agencies must provide residents a reasonable written notice before the process starts and the types of information that will be collected
- Option: residents paying flat rent may require a full reexamination process every 3 years. Each year unit size, community service, etc. is required
- HAs should begin the reexamination process 120-90 days before lease expiration

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## REMAINING FAMILY MEMBERS

- If the head of household dies or leaves the dwelling unit permanently for any reason, the remaining family members may continue to occupy the unit if there is at least one household member (not a live-in aide) of legal age and capacity to execute the lease living in the household.

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INTERIM REEXAMINATIONS  
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POSSIBLE REASONS FOR INTERIM REEXAMINATIONS

- Change in family composition
- Change in income
- Hardships

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MINIMUM RENT HARDSHIP EXEMPTION

- The Agency may be required to suspend minimum rent:
  - When the family has lost eligibility for or is awaiting an eligibility determination for a government assistance program;
  - When the family would be evicted because it is unable to pay the minimum rent;
  - When the income of the family has decreased because of changed circumstances including loss of employment;
  - When a death has occurred in the family; and
  - Other circumstances determined by the HA or HUD (currently none are required).

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## MINIMUM RENT HARDSHIP

- The Agency must advise families of minimum rent hardship if they are paying minimum rent
- The Agency cannot evict families for non-payment of rent 90 days following the request for hardship
- If a resident is denied the minimum rent hardship exemption, the resident is entitled to file a grievance and the HA may not require the resident to make an escrow deposit to obtain the grievance hearing.

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## LENGTH OF THE HARDSHIP

- If the hardship is verified to be temporary (less than 90 days), the Housing Agency must reinstate the minimum rent and offer the family a reasonable repayment agreement of the minimum rent that was suspended.
- If the hardship is verified to be long-term (lasting more than 90 days), the minimum rent must be suspended until the hardship ceases. The family may not be evicted for failing to pay the minimum rent while the hardship is occurring.

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## DECREASE OF INCOME

- Families paying income-based may request a reexam to adjust their rent
- Income must be verified and the decrease will follow the first day of the next month

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**CHANGE IN CIRCUMSTANCES**

- When families gain an additional dependent;
- When a family's child care costs increase with no increase in income;
- When an elderly or disabled family's unreimbursed medical costs increase;
- When a family that was not an elderly or disabled family becomes an elderly or disabled family; and
- When a family's disability expense allowance increases.

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**COMMUNITY SERVICE & ECONOMIC SELF-SUFFICIENCY**  
CHAPTER 11

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**HOW TO ADMINISTER CSSR PROGRAMS**

- For Public Housing the HA is responsible for administration of the Community Service and Self-Sufficiency Requirement (CSSR) and provide for these policies in their ACOP and procedures
- Current Resources include:
  - PIH 2015-12 AND HUD Training video – link in PIH 2015-12
  - PIH 2016-05 Attachment I and PIH 2016-06
  - CFR Subpart F 960.600-609, CFR Subpart F 960.005 (Discretionary): Permits the HA (does not require the HA) to accept resident self-certifications of compliance with the CSSR. 960.607 requires an agency that elects to accept self-certification to notify the resident that these may be subject to third-party verification and requires the agency to validate a sample annually (see attachment C of PIH 2016-06)

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## HOW TO ADMINISTER CSSR PROGRAMS

- Guidance for agency and HUD oversight are the result of an OIG audit that found a myriad of non-compliance issues.
- Community Service is "The performance of voluntary work or duties that are a public benefit and serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. CSSR is not employment and may not include political activities – CSSR is statutory within the Quality Housing and Work Responsibility Act of 1998.
- CSSR mandate that each non-exempt adult household member (18 years or older) shall either contribute 8 hours per month of Community Service or Self-Sufficiency activity or some combination.

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## HOW TO ADMINISTER CSSR PROGRAMS

- The CSSR may be completed at 8 hours each month or may be aggregated across a year. Any blocking of hours is acceptable as long as 96 hours is completed by each annual certification
- The lease is a 12 month term (24 CFR 966.53(c) – If there is non-compliance, The HA must give written notice to the tenant of the non-compliance and include a statement that the HA will not renew the lease at the end of the 12 month period unless the tenant enters a 12 month workout agreement.
- If non-compliance continues, at the end of the 12 month lease term a notice to vacate (based on the HA not renewing the lease) is issued. If the tenant does not vacate based on the HA's decision not to renew the lease, then eviction action is taken by the Agency

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## ELIGIBLE ACTIVITIES

- Volunteer Work at public or non-profit
- Programs funded under Older Americans Act
- Senior organizations
- Resident organizations
- Resident advisory committees
- At the PHA to improve physical conditions
- Children's programs
- Senior's programs
- Special Projects

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### ELIGIBLE SELF-SUFFICIENCY ACTIVITIES

- Job readiness programs;
- Job training programs;
- Skills training programs;
- Higher education (Junior college or college);
- GED classes;
- Apprenticeships (formal or informal);
- Substance abuse or mental health counseling;
- English proficiency or literacy (reading) classes;
- English as a second language classes;
- Budgeting and credit counseling; and
- Carrying out any activity required by the Department of Public Assistance as part of welfare reform.

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### EXEMPT RESIDENTS

- 62 years or older;
- A blind Person or a person with disabilities and certifies that, based on the disability, he or she cannot comply with the requirement;
- Caretakers of a person with disability who has certified that based on the disability, he or she cannot comply the requirement;
- Currently engages in work activities as defined as an activity listed in Section 407(d) of the Social Security Act (42 U.S.C. Section 607(d)
- Working, as defined by the agency ACOP
- Certified as exempt from work activities under a State Programs as stated by the Social Security Act or any other welfare state program; and
- Members of a family receiving benefits from a State Welfare Program in compliance with the program's requirements.

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### EXEMPT RESIDENTS

- Able to meet requirements under a State Program funded under part A of title IV of the Social Security Act (42 U.S.C. Section 601 or under any other welfare program of the State in which the HA is located, including a State-administered Welfare-to-Work program
- A member of a family receiving assistance, benefits or services under a State program under part A of Title IV SSA and has not been found by the State or other administering entity to be in non-compliance with such a program. (SNAP may be an example)

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**GRIEVANCE PROCEDURES**  
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**APPLICABILITY - APPLIES ONLY TO RESIDENTS**

- The grievance procedure must contain a statement of applicability, in which the Agency describes the situations for which the grievance procedure is not applicable
- Types of terminations not subject to the grievance:
  - Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA;
  - Any violent or drug-related criminal activity on or off such premises; or
  - Any criminal activity that resulted in felony conviction of a household member

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**INFORMAL GRIEVANCE PROCESS**

- Any Grievance shall be personally presented, either orally or written to the HA office or property office where the resident resides
- Informal settlement is intended so that the grievance may be discussed and settled without a formal grievance hearing
- Summary of such discussion is prepared and one copy shall be given to the resident and one retained in the resident file
- The Summary shall specify the names and dates of the meeting, and the nature of the proposed disposition of the grievance by management and specific reasons for the decision and shall specify the procedures by which a formal Grievance hearing may be obtained if the complainant resident is not satisfied

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### ACOP PROCEDURES FOR A FORMAL GRIEVANCE HEARING

- Housing Agency's informal hearing must state a resolution was not reached and the complainant is not satisfied
- The complainant must submit a written request for a formal grievance hearing within a reasonable time.
- The procedure must state:
  - The reason(s) for the grievance; and
  - The action sought from the Public Housing Agency.

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### FORMAL GRIEVANCE PROCEDURE

- If the complainant does not request a hearing within the specified timeframe, the decision of the informal hearing will be final
- Failure to request a formal hearing, however, does not affect the tenant's right to a court hearing on the matter.

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### SELECTING HEARING OFFICERS

- A impartial person, appointed by the HA will conduct the formal grievance hearing
  - The person cannot have conducted or approved the PHA's original action or be subordinate to that person
- The HA must consult with the Resident Advisory Board (RAB) and comments considered before making appointments

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## ESCROW DEPOSITS

- If the grievance involves rent payable, the complainant must pay into an escrow account
- The amount is the amount of rent owed
- The family must enter the same amount each month until the grievance is resolved
- Failure to pay terminates the grievance procedure
  - The tenant still has the right to judicial proceedings
- The HA must waive this requirement if the tenant is paying minimum rent and the grievance is based on a request for hardship exemption or imputed welfare income.

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## ELEMENTS OF THE FINAL DECISIONS AS A WRITTEN STATEMENT

- Introduction
  - names of complainant and hearing officer
  - Dates
  - Times
  - Location
  - Participants
- Hearing Summary
  - Summarize all written and oral evidence
- Decision
  - The hearing officer should cite the policy or regulation that supports the decision

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## FINAL DECISIONS

- A copy must be kept in the tenant file
- The decisions is binding on the PHA, unless:
  - The grievance does not concern PHA action or failure to act in accordance with or involving the complainant's lease or PHA regulations, which adversely affect the complainant's rights, duties, welfare or status; or
  - The decision of the hearing officer/panel is contrary to Federal, state or local law, HUD regulations or requirements of the annual contributions contract between HUD and the PHA.

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## REASONABLE ACCOMMODATIONS

- Housing Agencies are reminded that they are required to provide reasonable accommodation for persons with disabilities throughout the grievance process.
- Accommodating tenants with disabilities
  - accepting grievances at alternate sites or by mail
  - Having staff reduce an oral request for a grievance to writing
  - providing accommodations in the grievance hearing itself by providing qualified sign language interpreters, readers, accessible locations or attendants

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## PUBLIC HOUSING GRIEVANCE PROCEDURES PIH 2016-05 - DISCRETIONARY

- Housing Agency may maintain the current Grievance Policy and Procedure
- If the HA opts for this discretionary provision, the lease and ACOP must reflect the changes

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## GRIEVANCE PROCEDURE DISCRETIONARY OPTION - REQUIREMENTS

- Requires HA to incorporate policies for selecting a hearing officer in the dwelling lease and to revise the lease accordingly
- Requires that a written notification specifying the time, place, and procedures governing the hearing must be delivered to the complainant resident and appropriate official
- Requires the HA to create a log of hearing officer decisions and make the log available to the hearing officer, prospective complainants and their representative. At minimum, the date of the hearing decision and the general reasons for the grievance hearing, and whether the decision was in the favor of the resident or the Housing Agency

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REVIEW TIME

- Questions?
- Conclusions
- Evaluations

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