

Resident Selection Plan for Charity's House Apartments

The policy of Charity's House, (CH) is of Equal Housing Opportunity for prospective applicants regardless of race, color, religion, sex, handicap, familial status, national origin, age, creed, sexual orientation, gender identity, marital status, and status with regard to public assistance. In addition, Charity's House complies with local fair housing and civil rights laws and will provide reasonable accommodations to applicants if they or any family member has a disability or handicap. The purpose of this document is to describe the policies and practices of Charity's House in the Resident Selection Process for Charity's House.

Charity's House uses a Housing First Model as well as Harm Reduction and Trauma-informed approaches in its Permanent Supportive Housing (PSH) Development. Housing First embraces the idea that people participating in a PSH program should be given housing even if they are struggling with issues of chemical dependency, mental illness and/or other barriers to housing that might render them ineligible under more traditional models of housing.

Core Elements of Housing First Include:

- Acceptance of applicants regardless of their sobriety, any past or current use of substances, any completion of rehabilitation or treatment or participation in any other supportive services.
- Applicants are seldom rejected solely on the basis of poor credit or financial history, poor or absent rental history, criminal convictions, or any other behaviors that are generally held to indicate a lack of "housing readiness."
- Supportive services emphasize engagement and problem-solving over therapeutic goals. Services plans are highly tenant-driven without standardized or predetermined goals, and client choice is key in this approach.
- Use of alcohol or drugs in and of itself (without other lease violations) is not considered a reason for eviction.

1. CHARITY'S HOUSE WAITING LIST PREFERENCES

Charity's House is a 36-unit permanent supportive housing project, located at 3026 Welton Street, Denver, CO 80205. It is designed for individuals and families who have a history of homelessness or who are at-risk of becoming homeless and will benefit from supportive services. Generally, these individuals and families have faced multiple barriers to obtaining or maintaining housing due to: criminal histories, chronic and/or persistent mental illness, alcohol and/or substance abuse, health issues, unemployment and/or underemployment.

Property Preferences/Eligibility Screening Process

- a. All applicants will be referred through OneHome (Coordinated Entry System (CES)), who have been screened and assessed using the VI-SPDAT (Vulnerability-Index Service Prioritization and Decision Assistance Tool). They will be prioritized on the waiting list according to their score (highest to lowest) based on chronicity and medical vulnerability of people experiencing or at-risk of homelessness.

- b. In addition to the VI-SPDAT score, a filter will be put on the CES priority list to give higher priority to people who a.) would benefit from behavioral health services; and/or b.) would benefit from services because of involvement in the criminal justice system.
- c. When a unit designated as handicapped accessible becomes available, the first person on the waiting list who has indicated a verifiable need for the features of a handicapped accessible unit will be contacted for an interview. If the applicant meets the minimum screening criteria, they will be offered the unit before other applicants.

2. CHARITY'S HOUSE APPLICATION PROCEDURE

- A. An applicant must submit a completed DHA application to be considered for residency at Charity's House. Incomplete applications will be returned to the applicant to complete. Staff from Charity's House will make every effort to assist potential applicants in filling out the application and accompany them to deliver the application.
- B. Once the completed application is received, it will be forwarded to the Denver Housing Authority: Housing Department, 777 Grant Street, Denver, CO 80203. DHA will administer the project-based vouchers and maintain the waiting list for the 36 units at Charity's House.
- C. DHA will enter all applications into DHA's system.
- D. All complete applications that meet one of the preferences for Charity's House will be added to the waitlist.
- E. Placement on the waiting list does not automatically guarantee eligibility for an apartment. Further screening, as described in the eligibility screening criteria section, will be completed at the time an apartment becomes available and the applicant comes to the top of the waiting list.
- F. Once BlueLine Property Management (BLPMC) and CH are aware that a unit will be coming available, they will contact OneHome CES to let them know of the vacancy.
- G. OneHome CES will pull the next available applicant off the waiting list and arrange a time to meet and verify the information provided on the application.

- H. Once verified, CES will notify BLPMC and Charity's House that they may begin their screening process.
- I. If the applicant is deemed ineligible, Charity's House must supply a copy of the written denial to DHA.
- J. If the applicant is deemed eligible by both Charity's House and DHA, DHA will contact the applicant and conduct a Project-Based Voucher briefing.

3. ELIGIBILITY SCREENING CRITERIA

Project-Based Voucher Eligibility Screening:

- a. Meets one or more waiting list preferences.
- b. Citizenship Requirements - The household's members must be U.S. citizens, or non-citizens eligible for housing assistance who declare their eligibility and provide documentation to prove and permit verification of eligible status.
- c. Social Security Number Requirements - The household's members must disclose and document social security numbers (SSN) or where a SSN has not been assigned, have certified that they do not have a SSN.
- d. Income Limits – To occupy a HUD assisted PBV unit, applicant must meet income eligibility requirements as outlined by HUD.
- e. Student Eligibility – If a single applicant or all members of an applicant household are full time students, the application will be rejected unless one of the following criteria is met;
 - the applicant is married and files a joint tax return;
 - the applicant is receiving assistance under Title IV of the Social Security Act;
 - the applicant is enrolled in a job training program receiving assistance under the Job Training Partnership Act or under other similar Federal, State or local laws;
 - the applicant is a single parent with children and such parent and children are not dependents of another individual.

Criminal History Screening Criteria:

- A. Criminal background checks are required for all adult applicants. Due to HUD regulations, the following Criminal Histories are reasons for denying admission if any household member:
 - has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine in any location, not just federally assisted housing;
 - has been convicted of sex assault within the past 10 years;
 - is currently registered as a sex offender under any State registration requirement, regardless whether it's for lifetime.

B. The following Criminal Histories are not an automatic reason for denial but will be considered for denying admission (denials will be done on a case-by-case basis) if any household member:

- has been evicted from federally-assisted housing in the last 3 years for drug-related criminal activity;
- has been convicted of felony assault within the past one year;
- has been convicted of 5 or more assaults of any kind within the past 5 years;
- has been convicted of arson or homicide within the past 10 years.

4. NOTIFICATION OF DENIALS

Once applicant screening has been completed and all materials have been verified and evaluated, any application not meeting the above criteria will be denied. BLPMC must give an applicant prompt notice of a decision denying assistance. The notice must contain a brief statement of the reason for the denial and must also state that the applicant may request an informal review of the decision. A copy of this denial must also be sent to DHA.

5. APPEAL PROCESS

The applicant shall have 10 business days from the date of the letter to request, in writing, an informal review of the decision for denial. Charity's House must schedule and send written notice of the informal review within 10 business days of the family's request. The informal review must be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person. Charity's House will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 10 business days of the informal review to the applicant and his or her representative, if any, along with proof of mailing.

If the decision to deny is overturned as a result of the informal review, processing for admission will resume.

If the family fails to appear for their informal review, the denial of admission will stand and the family will be notified.

6. OCCUPANCY STANDARDS

A. Residents will be required to meet the following standards for occupancy:

Household Members

<u>Size</u>	<u>Minimum</u>	<u>Maximum</u>
1 bedroom	1	2

A. Household members include:

- (1) all fulltime members of the household;
- (2) children who are away at school but live with the family during school recesses;
- (3) children who are subject to a joint custody agreement but live in the unit at least 50% of the time;
- (4) an unborn child;
- (5) foster children;
- (6) live-in attendants.

B. After move-in, if a unit becomes overcrowded or under-utilized because of changes in household composition, the resident will be required to move.

7. UNIT TRANSFER POLICIES

- A. Existing residents residing in a non-accessible apartment and having a verified need for the special features of an accessible apartment will be transferred to accessible unit before applicants on the waiting list that need an accessible unit.
- B. Existing residents may request and be granted another apartment based on reasonable accommodation approval.

8. COMPLIANCE WITH SECTION 504 AND FAIR HOUSING ACT

- A. In accordance with Section 504 of the Rehabilitation Act of 1973, Charity's House hereby notifies the public that:
 - (1) No qualified individual with disabilities shall, solely on the basis of disability, be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination under any federally assisted program or activity managed by Charity's House;
 - (2) Charity's House shall provide employment opportunities, benefits, access to housing and other appropriate services in a manner that will not subject qualified individuals with disabilities to discrimination solely on the basis of disability;
 - (3) Charity's House will not participate in any contractual or other relationship that has the effect of subjecting qualified individuals with disabilities to discrimination solely on the basis of disability;
 - (4) It is the intention of Charity's House to take reasonable, affirmative steps to increase access and opportunities for persons with disabilities to apply for, and if found eligible, enjoy the housing premises;
 - (5) Charity's House will not discriminate on the basis of race, color, sex,

sexual orientation, gender identity, marital status, familial status, lawful source of income, ancestry, religion, age handicap, disability or national origin in the leasing, rental or other disposition of housing or related facilities under its jurisdictions, and shall not on account of any of the foregoing factors:

- a. Deny any individual or family the opportunity to apply for housing, nor deny to any eligible applicant the opportunity to lease housing suitable to its needs;
 - b. Provide housing which is different than that provided others;
 - c. Subject a person to segregation or disparate treatment;
 - d. Restrict a person's access to any benefit enjoyed by others in connection with the housing program;
 - e. Treat a person differently in determining eligibility or other requirements for admission;
 - f. Deny a person access to the same level of services;
 - g. Deny a person the opportunity to participate in a planning or advisory group, which may be an integral part of the housing program.
- (6) It is the policy of Charity's House to consider all requests by individuals with a disability for "reasonable accommodation" both in policies and procedures, as well as modification of units or premises that assist in providing an equal opportunity to use and enjoy the programs under which the project is funded. It is the policy of Charity's House to verify that the household making a request for reasonable accommodation due to a disability includes an individual with disabilities as defined by federal law.
- a. If a family is denied acceptance and indicates that the behavior of a family member with a disability is the reason for the proposed denial of assistance, Charity's House will determine whether the behavior is related to the stated disability. If so, upon the family's request, Charity's House will determine whether admitting the family as a reasonable accommodation is appropriate. Charity's House will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed denial of assistance.
 - b. In addition, Charity's House may perform reasonable structural modifications to housing and non-housing facilities where such modifications would be necessary to afford full access to the housing program for qualified individuals with disabilities. In reaching a reasonable accommodation with, or performing structural modifications for, otherwise qualified individuals with disabilities, Charity's House is not required to:
 1. Make structural alterations that require the removal or altering of a load-bearing structural component;
 2. Provide an elevator in any multi-family housing development solely for the purpose of locating accessible units above or below the grade level;
 3. Provide support services that are not already part of its

- housing programs;
 - 4. Take any action that would result in a fundamental alteration in the nature of the program or service;
 - 5. Take any action that would result in an undue financial and administrative burden on the project.
- c. It is the policy of Charity's House to protect the privacy of individuals covered by the Federal Privacy Act of 1974, and to ensure the protection of such individuals' verification records maintained at the property. Consistent with the intent of Section 504 of the Rehabilitation Act of 1973, any information obtained relating to disability status will be treated in a confidential manner. Information may be released to appropriate federal, state and local agencies, when relevant, and to civil, criminal or regulatory investigators and prosecutors. Information will not be otherwise disclosed or released unless the individual gives written authorization to do so.

9. AVAILABILITY OF PLAN

This Tenant Selection Plan is available to the public upon request. It can be requested at the rental office during normal office hours.

10. MODIFICATION OF PLAN

Charity's House will review this Tenant Selection Plan at least once annually to ensure that it reflects current operating practices and program priorities. If Charity's House feels the plan needs to be modified in any way, a notice of such modification will be provided by mail to applicants on the waiting list. For this reason, the current Tenant Selection Plan in place at Charity's House will always be dated.