

Chapter 4

VOUCHER ISSUANCE PROCESS

[24 CFR 982.204]

It is the policy of SHA to ensure that all families who express an interest in housing assistance are given an equal opportunity to apply and are treated in a fair and consistent manner. This Chapter describes the local preferences which structure the order in which applicants on SHA's Housing Choice Voucher Program waiting list are considered, and SHA's policies and procedures for applying for the Housing Choice Voucher Program through SHA's general public waiting list.

The application process for agency-based vouchers is described in Chapter 6, and the application process for project-based vouchers is described in Chapter 5.

A. Family Outreach

SHA will publicize and disseminate information about the availability of housing assistance for very low-income families on a regular basis.

SHA will communicate the status of housing availability to other service providers in the community, and advise them of eligibility requirements and guidelines so that they can make proper referrals for housing assistance.

B. Opening and Closing of the Waiting List [24 CFR 982.206, 982.54(d)(1); SHA Board Resolution 4692 dated May 19, 2003]

At this time SHA's waiting list for the Section 8 Housing Choice Voucher Program is closed to new applications. SHA's Executive Director may elect to open the Housing Choice Voucher waiting list at any time.

Opening the General Public Waiting List: Notice

SHA will give at least 30 days advance notice of the re-opening of the waiting list by public notice in a newspaper of general circulation such as *Real Change Newspaper*, by notice in its publication of record, the *Daily Journal of Commerce*, and by notices in various newspapers serving minority communities such as *The Facts*, *The Asian Weekly*, and other publications. SHA will also notify housing and service providers in the Seattle area, including public housing authorities serving adjacent jurisdictions (King County Housing Authority, Snohomish County Housing Authority, Renton Housing Authority) and housing and service providers in the Seattle area, including agencies which serve individuals with disabilities.

The notice will contain:

1. The dates, times, and the locations where families may apply;
2. The programs for which applications will be taken;
3. A brief description of the Housing Choice Voucher Program;
4. A statement that public housing residents must submit a separate application if they want to apply for a Housing Choice Voucher;
5. Limitations, if any, on who may apply;
6. SHA's address and telephone number;
7. How to submit an application; and
8. Information on eligibility criteria and local preferences.

The notices will be made in an accessible format upon request by a person with disabilities, as a reasonable accommodation.

Lottery Option

Upon re-opening the waiting list after a closure, SHA may assign positions on the waiting list to new applicants using any fair means, including "by lottery," i.e., assigning random numbers to all families who submit applications within a given time period, and then considering their applications in the order of the random numbers assigned to them. Random numbers thus assigned shall replace date and time of application for the purpose of structuring the order in which applications are considered.

Open Period

The open period shall be long enough to achieve a waiting list adequate to cover projected turnover and new allocations of vouchers for a period between 6 and 24 months, as determined by the SHA Executive Director or designated staff.

Closing the Waiting List: Notice

If SHA again re-opens the waiting list for an indefinite period, it may decide to close it again by SHA board resolution. SHA will give at least 30 days notice to the community by public notice in a newspaper of general circulation such as *Real Change Newspaper*, by notice in its publication of record, the *Daily Journal of Commerce*, and by notice in various newspapers serving minority communities such as *The Facts*, *The Asian Weekly*, and other publications. SHA will also notify housing and service providers in the Seattle area, including public housing authorities serving adjacent jurisdictions (King County Housing Authority, Snohomish County Housing Authority, Renton Housing Authority) and agencies serving individuals with disabilities.

Upon request from a person with a disability, additional time not to exceed 60 days may be given as an accommodation for submission of an application after the closing deadline. This accommodation shall be offered upon suitable third-party documentation of the disability and the person's inability to apply by the closing date because of the disability.

C. Local Preferences [24 CFR 982.207; SHA Board Resolution 4680 dated December 16, 2002]

SHA has established local preferences for the tenant-based Housing Choice Voucher Program to accomplish the following goals:

1. Address first the most urgent housing needs of applicants able to live independently in privately owned rental housing;
2. Provide a rational, efficient admissions process that treats applicants with respect, fosters honesty and open communication between staff and applicants and minimizes inconvenience for applicants;
3. Maximize use of SHA housing resources by encouraging high Housing Choice Voucher utilization rates; and
4. Support households moving through the continuum of affordable housing in Seattle from more highly supported environments into less highly supported housing, when the household no longer needs intensive case management or other support services.

Statement of Local Preferences

The Seattle Housing Authority shall give preference to applicants on the general public waiting list for the Housing Choice Voucher Program, as described below:

First priority shall be given to the following (equally assigned):

1. Households whose current gross income is at or below 30 percent of area median income, as established annually by the U.S. Department of Housing and Urban Affairs for the Seattle-Everett area and adjusted for family size;
2. Households whose gross income for the 12-month period prior to the eligibility determination is at or below 30 percent of median income, as established annually by the U.S. Department of Housing and Urban Affairs for the Seattle-Everett area and adjusted for family size; and
3. Households who are homeless, which is defined as:
 - a) Living on the street, in an emergency shelter, or in a transitional housing facility;
 - b) Being a client of a case-management program serving the homeless; or
 - c) Meeting one of these conditions within the 12-month period prior to the eligibility determination.

Second priority:

1. All applicants who do not meet the criteria to claim one of the preferences described above.

Priority Within Preference Groupings

All first priority applicants on the general public waiting list will be contacted in the order of date of application, before any second priority applicant on the waiting list is contacted.

After Initial Waiting List Contact, Assistance is Based on Date Application Process is Completed

After the point of initial contact with an applicant on the waiting list, housing assistance will be offered to applicants in the order in which they complete the application process.

Public Notice for Changes in Preferences

SHA will provide notice to the public when changing its preference system using the same guidelines as those for opening and closing the waiting list. In addition, SHA shall hold a public hearing for the purpose of taking comment on proposed changes in its preference policies.

Sequence Dates/Date and Time of Application

For all applicants with the same priority on the general public waiting list, SHA shall use an assigned sequence date to determine the order in which applicants on the waiting list are contacted. In general, the sequence date is the date of initial application, provided an applicant's claimed preference does not change while the applicant is on the waiting list.

However, if an applicant household's circumstances change such that the applicant is able to claim a higher priority for admission than when he or she initially applied, the sequence date shall change to the date the applicant claimed the higher priority.

If an applicant household's circumstances change such that it is no longer able to claim a higher priority, the original sequence date shall not change.

Income Targeting

In general, SHA exceeds the income targeting requirements for the Housing Choice Voucher Program, through the natural operation of its local preferences described above. SHA shall review the income levels of current program participants at least annually to determine that at least 75 percent of the participants and at least 75 percent of new voucher issuances are provided to families at or below 30 percent of area median income as determined by HUD.

Verification of Preference Qualification/Preference Denial [24 CFR 982.207]

SHA will verify all preference claims at the time of the eligibility determination, using standards described in Chapter 9. If the preference verification indicates that an applicant does not qualify for the preference at the time of the eligibility determination, the applicant will be returned to the waiting list without the preference but with the same sequence date, until such time as SHA is able to consider second priority applicants.

If SHA denies a preference, SHA will notify the applicant in writing of the reasons why the preference was denied and offer the applicant an opportunity for a meeting with the Issuance

Supervisor. If the preference denial is upheld as a result of the meeting, or the applicant does not request a meeting, the applicant will be placed on the waiting list without benefit of the preference. Applicants may exercise other rights if they believe they have been discriminated against.

Appeals of the Issuance Supervisor's decision not to grant a preference may be made in writing to the Section 8 Manager, who will make the final decision.

If the applicant falsifies documents or makes false statements in order to qualify for a preference, they will be removed from the waiting list and may not reapply.

Other Housing Assistance [24 CFR 982.205(b)]

Other housing assistance means a federal, state or local housing subsidy, as determined by HUD, including public housing.

SHA may not take any of the following actions because an applicant has applied for, received, or refused other housing:

1. Refuse to list the applicant on the SHA waiting list for tenant-based assistance;
2. Deny any admission preference for which the applicant is currently qualified;
3. Change the applicant's place on the waiting list based on preference, date and time of application, or other factors affecting selection under SHA selection policy; or
4. Remove the applicant from the waiting list.

D. Selection Process for Special/Targeted Vouchers

SHA shall carefully observe the eligibility and tenant selection requirements for targeted vouchers, as they are described in the HUD Notice Of Funding Availability (NOFA) announcing the availability of the vouchers, and in HUD award letters. SHA shall also carry out the commitments it makes in its grant applications submitted to HUD in response to NOFAs for targeted vouchers.

SHA currently is responsible for the following voucher programs which carry additional eligibility requirements and in some cases unique selection processes:

Family Unification Vouchers

SHA administers Family Unification Program (FUP) vouchers for at-risk families and youth receiving services from the Washington State Department of Children and Family Services. The purpose of the program is to reduce the number of children delayed in returning to their parent/guardians, when the primary problem is decent, safe, and affordable housing. Applicants are referred by participating social services agencies under the terms of a Memorandum of Understanding. Local preferences do not apply.

The following agencies participate in the FUP program with SHA:

1. Seattle-King County Health Department;
2. First Place;
3. New Beginnings
4. YouthCare; and
5. YMCA.

Welfare to Work Vouchers

SHA administers 752 Welfare to Work vouchers for families receiving TANF, or who have received TANF in the 2 years previous to the eligibility determination, or who are eligible for TANF but do not receive it. The families must not be currently assisted with tenant-based Housing Choice Vouchers. The Welfare to Work voucher must be determined to be critical to the family's ability to successfully obtain or retain employment.

When a Welfare to Work voucher is available, SHA shall select a family eligible for the program from the SHA general public waiting list, in the order of the date of the family's application sequence date. Local preferences apply.

Mainstream Disability Vouchers

SHA administers 75 Mainstream Disability vouchers for elderly or non-elderly disabled families. Eligible families are selected from the general public waiting list in the order of their application sequence date. Local preferences apply.

Designated Housing Vouchers

SHA administers 200 Designated Housing vouchers for non-elderly disabled families who live in an SHA public housing building or are on the waiting list for SHA's Low Income Public Housing program. Local preferences do not apply.

SHA shall offer available Designated Housing vouchers to non-elderly disabled families in the following order:

1. Residents of a LIPH building designated to become a senior-only building;
2. Applicants on the site-based waiting list for a LIPH building designated as a senior-only building; and
3. Applicants on any LIPH waiting list who have applied for a Section 8 voucher.

HOPE for Elderly Independence

SHA continues to administer 100 Hope for Elderly Independence vouchers for very low-income elderly and disabled families referred by the City of Seattle Aging and Disabilities Services, who require housing assistance as well as supportive services to maintain an independent living

situation. When a HOPE for Elderly Independence voucher is available, SHA will accept a new application referred by Aging and Disabilities Services, under the conditions of a Memorandum of Understanding. Local preferences do not apply.

HOPE VI Relocation Vouchers

SHA has received 771 relocation vouchers for LIPH families living in units slated for demolition as part of SHA's HOPE VI redevelopment projects. Local preferences do not apply.

If a HOPE VI relocation family is terminated from the Housing Choice Voucher Program, the voucher becomes a regular SHA Move to Work voucher available for any use consistent with this Plan.

Enhanced Vouchers

SHA administers enhanced vouchers for residents living in specific Section 8 opt-Out/prepayment buildings, for the period of time in which the original residents continue to live in the building. The vouchers are "enhanced" in that the family is assured it will not pay a higher portion of its income on housing expense than it did at the time the building opted out of the Section 8 program. When the original residents move out, they are issued a regular Housing Choice Voucher. Local preferences do not apply.

E. Cancellation/Reinstatement Policies [24 CFR 982.204(c)]

Requirement to Provide Current Mailing Address [CFR 982.204]

If a letter is returned by the Post Office, the applicant will be removed from the waiting list without further notice, and the envelope and letter will be maintained in the file.

Applicants are required to inform SHA in writing of changes in address, income or household composition. Applicants are also required to respond to requests from SHA to update information on their application and to confirm their interest in assistance. Failure to do so may result in removal of their applications from the waiting list.

Any mailings to an applicant which require a response will state that failure to respond within 10 business days will result in the applicant's name being removed from the waiting list. If the applicant fails to respond by the deadline stated in the written notice, the applicant will be removed from the waiting list without further notice. If the applicant contacts SHA within 5 days of their name being removed from the waitlist, the housing authority may place them back on the waitlist.

Purges

The general public waiting list may be purged from time to time at the discretion of the PorchLight Director, based on an assessment of the vitality of the current waiting list.

The purge will be conducted by a mailing to all applicants that will ask for confirmation within 30 days of continued interest in obtaining a Housing Choice Voucher. Applicants who fail to respond within the specified time period will be removed from the waiting list without further notice.

Reinstatement of Canceled Applications

Applicants whose applications have been cancelled for failure to respond to a written notice may request reinstatement of their application for a period of 12 months following the deadline for response. The Issuance Supervisor shall reinstate the application if the applicant has no previous history of failure to respond to written notices. The Issuance Supervisor may reinstate the application even with previous history of non-response if:

1. There is evidence that the applicant never received the notice;
2. There is evidence of SHA error;
3. The Issuance Supervisor determines that circumstances beyond the applicant's control prevented timely response to the notice (e.g., death in the family, hospitalization); or
4. There is evidence that the applicant is now able to complete the application process in a timely fashion (e.g., now has a case manager or other support services that will assist the applicant in the application process).

No applications will be reinstated after 12 months from a deadline to respond, unless the Issuance Supervisor determines that the applicant's failure to respond is caused by documented SHA error.

Appeals of the Issuance Supervisor's decision not to reinstate a canceled application may be made in writing to the Section 8 Manager, who will make the final decision.

Reinstated Applications: Priority for Funding

Reinstated applications shall be offered a voucher on the same timeline as other applications with the same preference and the same date of application, if funds are available.

However, all applications in progress as of the date of reinstatement shall have priority for funding over the reinstated application, even if they were submitted after the reinstated application's initial date of application. If funds are not available at the time of reinstatement after all applications in progress are offered a voucher, the reinstated application shall remain on the top of the waiting list until such time as vouchers are available for applications with the same or later dates of initial application.

F. Pre-Application Process

When the waiting list is open, any family asking to be placed on the waiting list for Housing Choice Voucher rental assistance will be given the opportunity to submit a completed pre-

application. No family shall be prevented from submitting this form because of apparent ineligibility.

The pre-application packet shall contain information on how to apply for all SHA housing programs, and may be made available in alternate formats upon request by a person with a disability.

The pre-application establishes the family's date and time of application for placement order on the waiting list, or for establishing the date/time segment within which SHA shall order the waiting list using random numbers. The pre-application records any local preference claimed by the applicant family, and gathers information about the family's eligibility for available Special Voucher Programs (e.g., Mainstream Disability vouchers, Designated Housing vouchers, Welfare to Work vouchers, etc.).

The pre-application is to be filled out by the applicant whenever possible. However, SHA staff may complete the form on behalf of the applicant upon request as a reasonable accommodation for a disability.

Obtaining and Submitting the Pre-Application

Families may obtain an application packet, including the pre-application, by:

1. Telephoning PorchLight and requesting that an application packet be mailed to them;
2. Visiting PorchLight or the SHA Wakefield Building (also known as Central Office, at 120 6th Avenue N., Seattle) during regular business hours and picking one up; or
3. Downloading the application materials from SHA's Web site.

Applicants may submit the pre-application in person or by mail, or may apply online at SHA's Web site when the online application program is available.

SHA will not accept faxed pre-applications, or pre-applications that are incomplete or illegible.

Application Information and Assistance

A complete Application Guide for all SHA programs is available in print from PorchLight and on the SHA Web site in the following languages: English, Chinese, Spanish, Russian, Vietnamese, and Somali.

Applicants may obtain assistance in completing the pre-application by visiting PorchLight and using the automated workshop kiosk in the PorchLight lobby or attending an application workshop if one is offered.

Upon request, SHA staff may also conduct "one-on-one" application workshops at PorchLight, in an applicant's home, or at other convenient and appropriate locations, as a reasonable accommodation for a person with a disability.

G. Issuance Process

Summary of Issuance Process

When a family reaches the top of the waiting list, SHA shall make a preliminary determination of eligibility based on the pre-application information. If the family appears to be eligible, the family will be invited to attend an issuance interview, at which time the family must submit documents required to verify household income, family composition, and the applicability of any claimed local preference. After the family has submitted all required documentation of income and family composition, SHA shall complete a criminal/credit check on the family. Provided the criminal/credit check is satisfactory, the family will be invited to a family briefing, after which it can pick up its voucher and begin its housing search.

Scheduling the Issuance Interview

The invitation to the issuance interview shall be provided in writing, and shall include information on the assigned date and time of the interview.

The invitation shall be provided in an accessible format upon request, as a reasonable accommodation for a person with a disability.

Applicants who cannot attend on the assigned date of the issuance interview may be given one opportunity to reschedule it.

SHA shall provide language interpreters to families who request them in writing when the interview is scheduled.

An applicant with a disability may request a private issuance interview at PorchLight or at a more accessible location, as a reasonable accommodation.

Cancellation and Reinstatement of Applications for Non-Response/No Show

Applicants who miss the initial issuance interview appointment may request to reschedule it, once. The request must be made within 10 business days following the original interview date. If an applicant misses the scheduled interview and does not request to reschedule the interview, or misses the second interview, SHA will cancel the application.

SHA shall follow the cancellation/reinstatement policy described above for applicants who fail to respond to a written notice of an interview appointment, or fail to show up for their scheduled interview.

Denial of an Application Based on Information on Pre-Application

If the family is determined to be ineligible based on the information provided in the pre-application, SHA will notify the family in writing (in an accessible format upon request as a

reasonable accommodation), state the reason(s), and inform them of their right to an informal review, as described in Chapter 20.

Applicant Denied Because They are Younger than Age 18

Applicants who are not eligible because they are younger than 18 years old may remain on the Section 8 waiting list until they are 18, at which time their application will be processed if funds are available. Their sequence date will not change.

Final Application Mailed Out Before Issuance Interview

Prior to the issuance interview, SHA shall provide the applicant with a packet including the full, final application and instructions on documents the family must bring to the interview in order to verify the information on the final application. The full application will be completed when the applicant attends the interview.

The applicant is expected to complete the full application in his or her own handwriting, prior to or in the issuance interview, unless a request for accommodation is made by a person with a disability for special assistance in filling out the application.

Format of Issuance Interview

Issuance interviews may be conducted in a group format.

The head of household, co-head, or spouse is required to attend the interview, and provide certifications needed for the family.

Applicants (with or without a disability) may bring family members, case-managers or advocates with them to the issuance interview, who may assist them with the application process, but only with the permission of the applicant.

Required Releases of Information

All adult members must sign the HUD Form 9886, Release of Information, the application form and all supplemental forms required by SHA, and any other documents required by SHA.

Applicants will be required to sign specific verification forms for information that is not covered by the HUD Form 9886. Failure to do so will be cause for denial of the application for failure to provide necessary certifications and release as required by SHA.

Every adult household member must sign a consent form to release criminal, credit, and rental history records and to allow SHA to receive records and use them in accordance with HUD regulations.

Applicants who wish to have case-managers, advocates or other intermediaries act on their behalf must sign a release of information authorizing SHA staff to discuss their application information with the intermediary.

Completing the Final Application After the Issuance Interview

If SHA determines at or after the interview that additional information or document(s) are needed, SHA will request the document(s) or information in writing. The family will be given 10 business days to supply the information.

If the information is not supplied within this time period, SHA will cancel the application for non-response. The reinstatement policy described above will apply to applications cancelled for not responding to requests for information.

Resubmission of Outdated Income Documentation

As a general rule, income information must be current within 60 days of the date of issuance of a voucher, although some documents may have different standards of currency, as described in Chapter 9, Verification Procedures. Applicants may have to re-submit documentation if the documentation previously submitted is no longer current according to the standards described in Chapter 9.

Verification of Information [24 CFR 982.201(e)]

Information provided by the applicant will be verified, using the verification procedures in Chapter 9, Verification Procedures. Family composition, income, allowances and deductions, assets, student status, immigration status, eligibility and rent calculation factors, and other pertinent information will be verified.

Credit/Criminal Check

After an applicant's file is complete with respect to income documentation and other elements of eligibility, SHA will order a criminal/credit check for the applicant. If the criminal/credit check reveals criminal history that does not meet SHA's standards for suitability/criminal history outlined in Chapter 2, SHA will notify the applicant in writing that the application is denied based on criminal history, and provide information on how to request an informal review as described in Chapter 20. A copy of the criminal history report will be mailed to the applicant along with the notice of denial.

If the credit information reveals information about the household that is not consistent with information about income or family composition on the application, or raises other questions, SHA will request a written clarification from the applicant, with a response deadline of 10 business days from the date of the request. If the applicant does not respond, the application will be cancelled, subject to the cancellation and reinstatement policy described above.

If the applicant does respond but the response is not satisfactory, SHA will notify the applicant in writing that the application is denied based on failure to provide satisfactory documentation of income, family composition, or other eligibility factors. The notice will provide information on how to request an informal review as described in Chapter 20.

Family Briefing and Voucher Issuance

After an applicant household has cleared the credit/criminal history check, the family will be invited to the next available family briefing session, at which time they will pick up their voucher. The briefing is mandatory; no family will be issued a voucher until they have attended one.

Voucher briefings are described in Chapter 10.

H. Changes in Income and Family Composition Prior to Lease-Up

Split Households After Pre-Application and Prior to Voucher Issuance

When a family on the waiting list splits into two otherwise eligible families due to divorce or legal separation, SHA shall give the two new families adjacent placement on the waiting list. The family must make a written request for separate applications, and provide: 1) documentation of the legal separation or divorce; and 2) an explanation of how the remaining family members, if any, will be divided among the two new households. Any grant awards or other income provided to the household members must logically represent household composition.

Split Households After Issuance and Before Lease-Up [24 CFR 982.315]

In those instances when a family assisted under the Housing Choice Voucher Program becomes divided into two otherwise eligible families due to divorce, legal separation, or the division of the family, and the new families cannot agree as to which new family unit should continue to receive the assistance, and there is no determination by a court, the Section 8 Manager shall consider the following factors to determine which of the families will continue to be assisted:

1. Which of the two new family units has custody of dependent children;
2. Which family member was the head of household when the voucher was initially issued (listed on the initial application);
3. The composition of the new family units, and which unit contains elderly or disabled members;
4. Whether domestic violence was involved in the breakup;
5. Which family members remain in the unit; and
6. Recommendations of social service professionals.

Documentation of these factors will be the responsibility of the requesting parties.

If documentation is not provided, SHA will terminate assistance on the basis of failure to provide information necessary for a determination of eligibility.