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# Tenant Selection Plan Weinberg Building

Crown Center for Senior Living 8350 Delcrest Drive St. Louis, MO 63124 Phone (314) 991-2055 Fax (314) 991-8419 Email: info@crowncenterstl.org

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#### **General Information**

Crown Center for Senior Living is a not-for-profit organization committed to providing affordable housing and supportive services to low-income elderly families.

Crown Center's Mission is to honor Jewish values and tradition; provide affordable, high-quality living and services to enable residents to flourish independently; and create inspiring programming to enable both residents and other community seniors to maintain an active and healthy lifestyle.

The procedures contained in this Tenant Selection Plan have been established in compliance with the Department of Housing and Urban Development (HUD), and all other applicable federal statutes and regulations. It is designed to promote fairness and uniformity to tenant selection and to promote efficiencies in the process by which all applications are processed.

The Tenant Selection criteria as established by Crown Center's Board of Directors, is designed to protect the owner, the residents and the applicant. The owner is protected against charges of illegal discrimination, arbitrariness and partiality. Residents are protected against the admission of someone who will not respect their rights of a decent, safe and livable environment. The applicant is protected against illegal discrimination and favoritism. The polices of the Tenant Selection Plan are applied to all applicants consistently and fairly, and all applicants are accepted or rejected by the same selection criteria.

The burden is on the applicant to demonstrate to the satisfaction of Crown Center that he/she meets these criteria. Failing to provide information requested or providing falsified or incomplete information will not result in tenancy.

It is sometimes necessary to deny admission to housing applicants whose habits and practices may reasonably be expected to have detrimental effect on other residents, the immediate environment or financial stability of the property. Therefore, to qualify for admission applicants/residents must meet the criteria in this document.

## <u>Eligibility</u>

## Age

To be eligible to for the apartments subsidized by the US Department of Housing and Urban Development (HUD), an applicant must qualify as an Elderly Family. HUD defines an Elderly family as: (1) Two or more persons, the head of which is 62 years of age or older; (2) A single person who is 62 years of age or older; or (3) Two or more elderly persons living together, or one or more such persons living with another person who is determined by HUD, based upon a licensed physician's certificate provided by the family, to be essential to their care or well-being.

Positive identification with a picture will be required and a photocopy will be kept on file. The head-of-household, co-head of household/spouse, and all other family members age 18 years of age and older are required to sign form HUD-9887/9887A consent and verification forms at





move-in and annually thereafter. All information reported by the family is subject to verification.

#### U.S. Citizenship Status

Assistance in subsidized housing is restricted to U.S. citizens or nationals and non-citizens who have eligible immigration status as determined by HUD. All family members are required to complete a Citizenship Declaration Form. For non-citizens age 62 and older, a signed declaration of eligible noncitizen status and proof of age will be required.

Non-citizen applicants will be required to submit evidence of eligible immigration status at the time of application and will be verified through the U.S. Immigration & Customs Enforcement, Systematic Alien Verification for Entitlements (SAVE) Program. All information reported by all family members is subject to verification.

#### **Social Security Numbers**

Each member of an applicant's household; except those who do not claim to have eligible immigration status or persons who were 62 or older and whose initial determination of eligibility was prior to January 31, 2010, must disclose and provide documentation of Social Security Numbers (SSN) before the household may be housed.

Applicants do not need to disclose their SSN in order to be placed on the Waiting List, however the applicant has 90 days from when they are offered an apartment to provide their SSN to retain their place on the Waiting List. Applications will be placed in pending status until proof of SSN is obtained. After 90 days, if the applicant is unable to provide proof of their SSN the applicant will be determined ineligible and removed from the Waiting List.

All Social Security Numbers (SSNs) for all applicants must be verified using appropriate documentation before the household can began living on the property, as required by HUD. Live-in Aides are also subject to the SSN requirements. The SSN provided will be compared to the information recorded in the Social Security Administration database, through HUD's Enterprise Income Verification System (EIV), to ensure that all household members information (SSN, birth date and last name) match within 90 days of move-in. If EIV returns an error that cannot be explained or resolved, tenancy may be terminated and any assistance paid in error must be returned to HUD. If an applicant/resident deliberately provides an inaccurate SSN, Crown Center and/or HUD may pursue additional penalties due to attempted fraud.

Applicants who need proof of Social Security Numbers (SSN) can contact the Social Security Administration at:

Website:	www.SSA.gov	
Phone:	1-800-772-1213	
TTY:	1-800-325-0778	



#### US Department of Housing and Urban Development (HUD) Assistance

The apartment at Crown Center must be the family's only residence. All applicants *must* disclose if they are currently receiving HUD assistance. Crown Center must not provide assistance to applicants who will maintain a residence in addition to the HUD-assisted apartment. Applicants must agree to pay the rent required by the program under which they will receive assistance. HUD provides Crown Center with information about an applicant's current status as a HUD housing assistance recipient. When processing an application Crown Center will conduct an Existing Tenant Search through HUD's Enterprise Income Verification System (EIV) to verify if the applicant and/or other members are currently receiving HUD assistance from applying to Crown Center, however the applicant must move out of their current property and/or forfeit any voucher before HUD assistance at Crown Center can begin. If any member of the applicant household fails to fully and accurately disclose rental history, the application may be denied based on the applicant's "misrepresentation" of information.

Crown Center processes a Multiple Subsidy Report through HUD's Enterprise Income Verification System (EIV) monthly, as required by HUD, to verify current residents are only receiving HUD assistance through Crown Center. If any household member receives or attempts to receive assistance in another HUD-assisted unit while receiving assistance at Crown Center, the household member will be required to reimburse HUD for assistance paid in error. This is considered a material noncompliance Lease violation and may result in penalties up to eviction and pursuit of fraud charges.

#### **Income Requirements**

Income limits have been established by the Crown Center Board of Directors for the Moderate Rental Plan; and by the Department of Housing and Urban Development (HUD) for the Affordable Rental Plan, to ensure service to those most in need of affordable housing.

The applicant family's annual income must not exceed those limits established by HUD and the Crown Center Board of Directors. Income Limits are based upon a percentage of the annual median income in the St. Louis Metropolitan Area for various household sizes

#### Effective April 2022:

Affordable Rental Plan Income Limits (HUD-Subsidized)		
1 Person household	Annual Income up to \$33,250	
2 Person household	Annual Income up to \$38,000	



Crown Center leasing staff will calculate applicant income based on a formula established by HUD. Please contact us for more information.

## **Occupancy Standards**

Crown Center has adopted the following occupancy standards:

Unit Size	Minimum Occupants	Maximum Occupants
One (1) Bedroom Unit	1	2

## Credit, Rental, Criminal History & Sources of Information

All applicant household members are subject to screening criteria established by the Crown Center Board of Directors and HUD. Crown Center uses specific criteria to determine an applicant's financial eligibility for admission. Crown Center also is required to use HUD's guidelines regarding drug-related and/or criminal activity (including registration as a sex offender) and screening of rental history.

Sources currently used to verify an applicant's information are:

- current and previous landlords/housing providers;
- credit bureaus;
- social workers, healthcare providers, clergy;
- character references as given on the application;
- police departments, neighbors, and neighborhood watch groups;
- the US Department of Justice National Sex Offender Public Website (NSOPW);
- home visit by Crown Center Client Services staff.

The applicant, or members of the applicant's household, including live-in aide, may be denied if any of the following facts have been verified:

- Past performance in meeting financial obligations has been poor as demonstrated by a credit report and/or landlord references. (Special circumstances may be considered.)
- Past conviction of drug-related activity, has a record of drug-related criminal activity, or has been evicted for drug-related activity. Drug-related criminal activity is the illegal manufacture, sale, distribution, use or possession with intent to manufacture, sell, distribute or use of controlled substance.
- Past eviction, within the last five (5) years of submitting the application. If the person evicted is a former tenant of HUD-subsidized housing who has a record of lease violations or whose residency was terminated by the management, the applicant will be denied.
- Past conviction of a violent crime or has had a felony within the past five (5) years of submitting the application.



- Previous record of criminal activity or of physical violence to persons or property which would adversely affect the health, safety or welfare of other residents or employees of the community or the right of residents to the peaceful enjoyment of the premises.
- Previous habits and practices which indicate applicant/applicants would be likely to have a detrimental effect on the Crown Center community if admitted.
- Previous unwillingness or ability to accept and abide by the terms of a lease agreement, all attachments, addenda and rules and regulations.
- Previous record of unlawful discharge of firearms

Crown Center will consider the nature of the crime, as well as the time since the offense/conviction occurred when making their eligibility determination.

The burden of proof is on the applicant to demonstrate, to the satisfaction of Crown Center that the he/she is willing to meet the requirements of the lease, which includes the ability to pay rent on time, live peacefully with neighbors by not disrupting the peaceful enjoyment of others living in the community, and to keep the apartment in clean, safe and sanitary condition. Applicants must also be willing to provide Crown Center with accurate and complete information during the application process and annual recertification.

Crown Center will be the final judge in of what constitutes adequate and credible information.

Pursuant to Federal law, persons evicted from public housing of Indian Housing (PHI) or any Section 23, or any Section 8 program because of drug related criminal activity are ineligible for admission to HUD-subsidized housing for a five (5) year period beginning on the date of such eviction.

The U.S. Department of Housing and Urban Development (HUD) prohibits any applicant or household member who has been convicted of, or is subject to a lifetime registration requirement under a state sex offender registration program from receiving federally subsidized housing.

The applicant/resident and all household members are subjected to a national sex offender check for all US states annually as part of their recertification process.

# Fair Housing and Equal Opportunity

Crown Center adheres to the Fair Housing Act and Federal Civil Rights Laws. Crown Center does not discriminate on the basis of race, color, sex, religion, age, disability, national origin, actual or perceived sexual orientation, gender identity, or marital status in the leasing, rental, or use or occupancy thereof.

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Crown Center shall not automatically deny admission to a particular group or category of otherwise eligible applicants. Each applicant in a particular group or category will be treated on an individual basis in the normal processing routine.

In addition, Crown Center does not:

- 1. Deny an applicant the opportunity to apply for housing, nor deny an eligible applicant the opportunity to lease housing suitable to his/her needs.
- 2. Provide housing which is different from that provided others.
- 3. Subject a person to segregation or disparate treatment.
- 4. Restrict a person's access to housing enjoyed by others.
- 5. Treat a person differently in determining eligibility or other requirements for admission.
- 6. Deny a person the opportunity to participate in a planning or advisory group.

# Section 504 and Grievance Procedure for Disability Discrimination

Crown Center does not discriminate on the basis of disability status in the admission or access to, or treatment or employment in its federally assisted programs and activities.

According to Section 504 of the Rehabilitation Act of 1973, "No otherwise qualified individual with disabilities in the United States shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Housing and Urban Development (HUD)."

In compliance with Section 504 regulations, we will take reasonable, nondiscriminatory steps to maximize the use of accessible units by eligible individuals whose disability requires the accessibility features of a particular unit. We will consider extenuating circumstances in the screening process for applicants with disabilities, where required as a matter of reasonable accommodation.

If at any time during the application process an applicant feels they have experienced discrimination based on disability, they may file a grievance with the 504 Coordinator of Crown Center, and also has the right to file a Fair Housing Complaint with the Fair Housing and Equal Opportunity office (FHEO) online at

https://www.hud.gov/program\_offices/fair\_housing\_equal\_opp , or by calling 1-800-669-9777 or 1-800-877-8339.



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## Victims of Domestic Violence

An applicant's or a tenant's status as a victim of domestic violence, dating violence, or stalking is not a basis for denial of rental assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission.

The Violence Against Women Act and Justice Department Reauthorization Act of 2013 (VAWA) applies to all multifamily assisted, federally funded, housing properties. VAWA provides legal protections to victims of domestic violence, dating violence, sexual assault, and stalking. Crown Center must provide applicants/residents the option to complete the Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation, form HUD-5382, when requested. The form may be made available to all eligible residents at the time of admission, or in the event of a termination, or start of an eviction for cause proceeding. The certification may be enclosed with the appropriate notice, directing the family to complete, sign and return the form within fourteen (14) business days.

#### Application Process

Those interested in living at Crown Center must complete and sign an application for housing. The application contains information sufficient to tentatively determine the family's eligibility, the head-of-household and family composition. The application also informs applicants that they will be subjected to a background check, including criminal history and sex offender screening, credit screening, and rental history screening.

To start the application process, potential applicants must start with the process listed below:

- 1. Request an application:
  - At Crown Center Management Office; at 8350 Delcrest Drive; Saint Louis, MO 63124
  - By United States Postal Service (USPS) via telephone at (314) 991-2055
  - By email at info@crowncenterstl.org
- 2. Complete the application fully, sign and date where indicated. The application must list all persons who will reside in the apartment unit. All applicants must sign and date the application.
- 3. Return the application by:
  - Dropping off at the Crown Center Management Office at 8350 Delcrest Drive, Saint Louis, MO 63124; or
  - By mailing to the Crown Center Management Office at 8350 Delcrest Drive, Saint Louis, MO 63124

A completed application contains an original signature and is therefore not acceptable by fax or e-mail.

Crown Center staff will receive the application and will mark it with the date and time received.





If there are no available units, the applicant name will be placed on the Waiting List in the order the application was received.

When the Management Staff is notified of an upcoming vacancy, staff will contact the applicant at the top of the Waiting List to inform the applicant that an apartment will be available soon.

If the applicant is ready to move, a letter will be sent to the applicant showing a list of documents needed to process the application. At that time, an appointment will be set up to return the documents and see the apartment, if the apartment is available to view. An interview will take place at the time the applicant brings the required documents. The Management Staff will review and discuss all items on the application. The applicant will be required to sign forms authorizing management to verify all information listed on the application. Until all items are verified, eligibility cannot be determined, nor housing offered.

If the applicant states he/she is not ready to move, the applicant will forfeit the offer and be moved to the bottom of the Waiting List. The next time the applicant is contacted, if he/she states that he/she is not ready to move, the applicant will be removed from the Waiting List.

The applicant can complete a new application and be added to the bottom of the Waiting List at any time.

Crown Center will accommodate persons with disabilities by providing alternative methods of application in-take and ensuring that notices and communications during all meetings will be provided in a manner that is effective for persons with hearing, vision, and other communications-related disabilities.

When the applicant's name comes to the top of the Waiting List, and the applicant cannot be reached by the phone number and/or address provided, the applicant will be removed from the Waiting List. Crown Center sends a letter annually to applicants on the Waiting List to confirm the applicants want to stay on the Waiting List and that Crown Center has current phone number and address; this is an annual "purge" of the Waiting List. If the annual purge letter is returned with the notice "unable to forward/not at this address" or similar, the applicant will be removed from the Waiting List. If the applicant phone number on file is not the correct phone number, the applicant will be removed from the Waiting List.

It is the applicant's responsibility to notify Crown Center of any changes to their information by phone or in writing in order to remain on the Waiting List.

## Screening for Acceptance or Rejection

Screening consists of the following:

- 1. Determination of preliminary eligibility
- 2. Interview conducted in person with the applicant(s)





- 3. Verification of eligibility criteria using consistent sources of information including: financial, credit, criminal, immigration, and leasing history verified through a third party
- 4. A home visit by a Crown Center staff member (conducted within the Saint Louis metropolitan area)
- 5. Final determination based on complete submission of all verification, satisfactorily meeting all elements of tenant selection criteria as outlined above.
- 6. After the screening process has been completed, applicants are notified in writing of acceptance or rejection for tenancy.

#### Appeals

If an applicant is rejected, a written notification is sent. This notice will contain the reason(s) the application was rejected. The applicant will have fourteen (14) days to appeal in writing to the Operations Director of Crown Center. The meeting will take place by another member of Crown Center different than the person who rejected the applicant.

Crown Center will respond to the applicant within 5 business days of the meeting to notify the applicant of the final decision.

## Waiting List & Internal Transfers

Crown Center's Waiting List is usually open. However, should the Waiting List need to close, the closing of the Waiting List, and reopening, will be done in a manner required by HUD.

- 1. All applicants who submit an application will be placed on the Waiting List regardless of race, color, sex, religion, age, disability, national origin, familial status, actual or perceived sexual orientation, gender identity, or marital status.
- 2. The Waiting List is arranged in chronological order based on the date and time the preapplication was received.
- 3. If the applicant states they are "not ready to move" or similar, they will be moved to the bottom of the waiting list. The second time they are called, if they are still not ready to move, they will be removed from the Waiting List and will have to complete a new application to be added back to the bottom of the Waiting List.
- 4. If the applicant appears for an interview, but refuses the offered apartment, he/she will be removed from the Waiting List. In order to be placed on the Waiting List again, the applicant will have to complete a new application to be added back to the bottom of the Waiting List.
- 5. The Waiting List is updated annually with the annual purge letter.
- 6. Internal moves are allowed with the following exceptions:





- Medical need, certified by a local medical professional as required by HUD
- At the request of Crown Center Management

#### **Questions**

We appreciate your interest in Crown Center for Senior Living and hope to welcome you home very soon. In the meantime, if you have any questions we hope you'll contact our office: (314) 991-2055.

#### Independent Student Status

HUD requires that the following information be included in this document. However, its relevance is limited to those households otherwise ineligible for tenancy at Crown Center.

HUD recently published a final rule implementing a new law that restricts individuals who are seeking Section 8 assistance and are enrolled at an institution of higher education, under the age of 24, not a veteran, unmarried, and do not have a dependent child from receiving Section 8 assistance. Such individuals are ineligible unless the student is determined independent from his or her parents upon review and verification of such status or the student is determined independent for 8 assistance.

The financial assistance of the student in excess of tuition will be included in annual income when determining the student's eligibility for Section 8 assistance, unless the student is over the age of 23 with dependent children and the determination of rent is made in accordance with the requirements of the Section 8 program. The financial assistance of a student residing with his or her parents would continue to be excluded from annual income. Management will ensure at each annual recertification that an independent student remains eligible to continue to receive Section 8 assistance.

During the application process, management will appropriately screen applicants and households for eligibility under this final rule. An applicant who is a student and who does not meet the income eligibility requirements or jointly, do not meet the income eligibility requirements for Section 8 assistance are not eligible for Section 8 assistance and will be prohibited form participating in the program. A student under the age of 24 who is not a veteran, unmarried, does not have a dependent child and who is currently receiving Section 8 assistance, if at recertification is determined to be ineligible, will have his/her assistance terminated.

