



# Tenant Selection Plan

Crown Center for Senior Living

**CC Phase I Building**

and

**Weinberg Building**

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[https://crowncenter.sharepoint.com/sites/CCSL/Shared Documents/Shared/Crown Center Phase I/Leasing\\_Community/Application materials/Tenant Selection Plan All Crown\\_final .docx](https://crowncenter.sharepoint.com/sites/CCSL/Shared Documents/Shared/Crown Center Phase I/Leasing_Community/Application materials/Tenant Selection Plan All Crown_final .docx)

### **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 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), Missouri Housing Development Commission (MHDC) and all other applicable state and 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 policies 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.

This property is operating under the guidelines established for layered housing programs- Department of Housing and Urban Development (HUD) Section 8 (Subsidized), and the Low-Income Housing Tax Credit (LIHTC) program (Affordable), overseen by the Missouri Housing Development Commission (MHDC), as well as the Market rate program. Because this plan covers the eligibility and tenant selection requirements for all programs, there are some areas of the plan that will only be applicable to one program. Those areas are identified throughout the plan.

This is not an assisted living property. Crown Center and property staff do not provide, nor have the authority to provide, any personal care or personal supervision services. All care and supervision services must be provided, arranged for, managed, and paid for by the resident or the resident's representative(s). Crown Center and property staff do not help with personal activities of daily living. A resident must be capable of fulfilling the lease requirements, with or without assistance.



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 the financial stability of the property. Therefore, to qualify for admission applicants/residents must meet the following criteria.

### **Eligibility Criteria**

#### **Age**

To be eligible for admission an applicant must qualify as an Elderly Family. An Elderly Family is defined by HUD as: (1) Two or more persons, the head of which (or his or her spouse) 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 to be essential to their care or well-being, based upon a licensed physician's certificate provided by the applicant.

All residents are required to provide positive identification with a picture, a photocopy of which will be kept on file. All members of the household are required to sign HUD-9887/9887A consent and verification forms at move-in and annually thereafter. All information reported by the household is subject to verification.

#### **Eligibility Requirements under the Noncitizen Rule**

According to Section 214 of the Housing and Community Development Act of 1980 (commonly known as the Noncitizen Rule), and Missouri House Bill No. 1549 Section 4 208-009 1-8, assistance in housing is restricted to United States Citizens, U.S. Nationals, and eligible non-citizens.

All applicants are required to complete a Citizenship Declaration Form at the time of application. Applicants claiming to be a U.S Citizen or a U.S. National must sign a declaration attesting to such status and provide proof of such status. Applicants claiming to have eligible immigration status must sign a declaration attesting to such status and provide documentation supporting such status.

All information provided in support of eligible immigration status will be independently verified through the U.S Citizenship and Immigration Service (USIS) S.A.V.E software before eligibility can be determined. The results of this verification will be used to determine eligibility.

#### **Social Security Numbers (SSN)**

Applicants are required to have and disclose their Social Security Number (SSN) to be placed on the waiting list. The documentation to verify the SSN is a valid Social Security Number card issued by the Social Security Administration, or an original document issued by a federal or state government agency which contains the name and SSN of the individual along with identifying information of the individual. This rule applies to all household members including live-in aides.



The Social Security Number requirement is waived for individuals who were 62 or older as of January 31, 2010 and were receiving HUD rental assistance at another location on January 31, 2010; and those who do not contend eligible immigration status.

If, at the time a unit becomes available, all non-exempt household members who have not provided adequate documentation necessary to verify SSN, the next eligible applicant must be offered the available unit. The applicant has ninety (90) days from the date they are first notified that a unit is available, to provide the necessary documentation to verify the SSN. During this 90-day period, the applicant household may retain its place on the waiting list but will not be considered again until the required documentation is provided. If, after 90 days, the applicant household is unable to disclose/verify the SSN of all household members, the household will be determined ineligible and removed from the Waiting List. The applicant may apply again, after obtaining the appropriate documentation. The applicant will be placed on the waiting list based on the date and time the **new** application is received.

Applicants without proof of Social Security Numbers (SSN) can contact the Social Security Administration (SSA) at:

Website: [www.SSA.gov](http://www.SSA.gov)  
Phone: 1-800-772-1213  
TTY: 1-800-325-0778

#### **HUD-Assistance (Subsidized Rental Plan)**

Applicants are eligible for assistance only if the unit will be the family's only residence. Applicants **must** disclose if they are currently receiving HUD assistance. Crown Center will not knowingly assist applicants who will maintain a residence in addition to the HUD-assisted apartment. If, for any reason, an applicant moves into this property before moving out of another subsidized unit, the new resident will be required to pay market rent until the move out from the previous property is complete and the resident is eligible to receive HUD Subsidy for this property. Assistance in the new unit will begin, if eligible, the day after assistance ends in the previous unit. Market rent will not be prorated.

Applicants must agree to pay the rent required by the program under which they will receive assistance. Crown Center will use the Existing Tenant Report provided via HUD's Enterprise Income Verification System (EIV) to determine if the applicant or any member of the applicant household is currently receiving HUD housing assistance. This report is based on the SSN provided. The SSN provided from all applicants on the Affordable Rental Plan, will be compared to the information recorded in the Social Security Administration database, through EIV, to ensure that all Affordable Rental Plan household members' information provided (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.

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 information is required by HUD to be reviewed by processing a Multiple Subsidy Report through EIV monthly. 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 vary by program type (Subsidized, Affordable or Market Rental Plan) and household size. Income limits have been established by the Crown Center Board of Directors for the Market Rental Plan; and by the Department of Housing and Urban Development (HUD) for the Subsidized (Section 8) and the Affordable (LIHTC) plans to ensure service to those most in need of affordable housing.

The applicant's household income must meet those income limits established by HUD for the Affordable and Low-Income Housing Tax Credit (LIHTC) program, and the Crown Center Board of Directors for the Moderate Rental Plan. Income Limits are based upon a percentage of the area median income in the St. Louis Metropolitan Area for various household sizes and updated annually by HUD.

Effective April 2022:

#### **Subsidized Rental Plan Income Limits (HUD-Subsidized Section 8) (50% of Area Median Income)**

1 Person household	Annual Income up to \$ 33,250
2 Person household	Annual Income up to \$ 38,000

#### **Affordable Rental Plan Income Limits (LIHTC) (60% of Area Median Income)**

1 person household	Annual Income up to \$ 39,900
2 Person household	Annual Income up to \$ 45,600

#### **Market Rental Plan Income Limits (100% of Area Median Income)**

1 Person household	Annual Income up to \$ 68,000
2 Person household	Annual Income up to \$ 77,750



Crown Center's Subsidized Rental Plan must rent at least 40 percent of the units that become available each fiscal year to households whose income does not exceed 30 percent of the area median income (Extremely Low Income (ELI) Limit) at the time of admission. If the applicant household income exceeds 30 percent of the area median income (AMI), but is below the federal poverty level, the family will not be skipped over on the Waiting List because of the ELI admission targeting requirements in the housing program. This is achieved by twice yearly review of the current resident income mix, and admissions are then modified as needed to comply.

Crown Center's Affordable (LIHTC) program must rent at least 40 percent of the units that become available to each fiscal year to families whose income does not exceed 60 percent of the AMI.

Crown Center leasing staff will calculate applicant income based on a formula established by HUD.

### **Occupancy Standards**

Crown Center complies with all local State and Federal occupancy standards.

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

All applicant household members are subject to screening criteria established by The Department of Housing and Urban Development (HUD), the Missouri Housing Development Commission (MHDC) and the Crown Center Board of Directors. 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 may include:

- 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 or designee, to determine applicant's ability to uphold the terms of the lease as related to safe and sanitary housekeeping conditions

Crown Center will review information provided. If information obtained is negative the applicant will be rejected. Negative responses include, but are not limited, to:



- 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 or a preponderance of evidence of a violent crime; or conviction or preponderance of evidence of committing a felony within the past five (5) years of submitting the application. Crown Center will consider the nature of the crime, as well as the time since the offense/conviction occurred when making their eligibility determination.
- 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.
- Previous record of activity, behaviors 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.
- 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 sex offender check for all U.S. states annually as part of their recertification process.
- 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.



The burden of proof is on the applicant to demonstrate, to the satisfaction of Crown Center that the applicant 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 a 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.

### **Fair Housing and Equal Opportunity**

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.

Crown Center will 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 to 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.

### **Non-Discrimination**

Crown Center complies fully with Section 504 of the Rehabilitation Act of 1973, The Fair Housing Act Amendments of 1988, and Title VI of the Civil Rights Act of 1964. Crown Center does not discriminate based on 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. In addition, Crown Center does not discriminate based on disability status in the admission or access to, or treatment or employment in its federally assisted programs and activities.

### **Section 504 of the Rehabilitation Act of 1973**

It is the policy of Crown Center to assure that qualified individuals with disabilities are not discriminated against based on their disability. 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 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](https://www.hud.gov/program_offices/fair_housing_equal_opp) , or by calling 1-800-669-9777 or 1-800-877-8339.

### **Violence Against Women Act**

An applicant's or a tenant's status as a victim of domestic violence, sexual assault, dating violence, or stalking, engaged by a member of a resident's household or any guest or other person under the resident's control, shall not be cause for termination of assistance, or occupancy rights if the resident or immediate member of the household is the victim or the threatened victim of that abuse.

The Violence Against Women Act and Justice Department Reauthorization Act of 2013 (VAWA) applies to all multifamily assisted, federally funded, housing properties, and provides legal protections to victims of domestic violence, dating violence, sexual assault, and stalking.

Crown Center will 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. This form will be made available to all 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 first complete an application for housing. The application contains information sufficient to tentatively determine the household's eligibility. The application also informs applicants that they will be subjected to a background check which includes, criminal history screening, State lifetime sex offender registration check, a credit screening, and rental history.

An existing household wishing to add a member must have the proposed new member of the household complete all application materials and must receive management approval prior to adding the member to the household or allowing the member to move into the apartment.

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

1. Request an application packet:
  - At Crown Center Management Office at 8350 Delcrest Drive; Saint Louis, MO 63124 (please phone ahead to check office hours)
  - By United States Postal Service (USPS) via telephone at (314) 991-2055



- By email at [info@crowncenterstl.org](mailto:info@crowncenterstl.org).
  - Download and print from Crown's website [www.crowncenterstl.org](http://www.crowncenterstl.org)
2. Complete all pages of the application packet. The application must list all persons who will reside in the apartment unit. All applicants must sign and date the application and all attached documents.
  3. Return the application by:
    - Dropping off at the Crown Center Management Office at 8350 Delcrest Drive, Saint Louis, MO 63124 (please phone ahead to check office hours); or
    - Mailing to the Crown Center Management Office at 8350 Delcrest Drive, Saint Louis, MO 63124

A complete application contains **original applicant signature(s)**, therefore is not acceptable by fax or e-mail.

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.

Applicants with limited English language skills may request appropriate accommodations for the application process.

When the application packet is received and completed in full, the date and time received will be marked on the application. If there are no available units, the applicant will be listed on the Crown Center Waiting List for the program(s) applied, in the order the application was received.

### **Waiting List Management**

The Crown Center Waiting Lists are arranged in chronological order based on the date and time the application was received. Management will select names from the waiting list in chronological order to fill vacancies or to fill appropriate unit type, including accessible units, or to meet HUD income standards applicable to Section 8 and LIHTC units set by HUD and MHDC. If necessary, a notation will be made on the waiting list to indicate why an applicant was skipped in order to comply with relevant HUD or MHDC requirements.

Applicants will be contacted when their name is approaching the top of the waiting list and/or management has been notified of an upcoming vacancy(s). They will be informed in writing that that an apartment is or may be available soon. The notification letter will include a list of documents that are required to be turned into the management office in advance of an interview. Until all items are verified, eligibility cannot be determined, nor any housing offered.



If the necessary documents are not turned in by the date stated in the letter, then the applicant may be removed from the waiting list. The applicant may reapply and added to the end of the waiting list as a new applicant.

Once an applicant has been determined eligible and meets all Crown Center requirements through the screening process, an acceptance letter will be sent. The applicant will be shown the available apartment or one similar.

This is considered having been offered an apartment.

Once you've been accepted and offered an apartment, if you state that you are not ready to move or turn down the offered apartment, you will be removed from the waiting list. You may reapply and go to the bottom of the waiting list as a new applicant.

Annually, all applicants will be sent a letter asking the household to confirm its continued interest in remaining on the Crown Center Waiting List. This letter will be sent to the last address on record and will provide a deadline by which the household must respond. If the letter is returned by the post office with a forwarding address label, the letter will be re-sent to the address listed. If the 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 is disconnected, or the phone number on file is not the correct phone number, the applicant will be removed from the Waiting List.

Applicants are responsible for reporting any changes to the information on their application to Crown Center by phone or in writing to remain on the Waiting List.

### **Unit Transfers**

Unit Transfers are not allowed with the following exceptions:

- Medical need, following the Reasonable Accommodation Process
- At the request of Crown Center Management
- For CC Phase I Building: current residents on the Market rental plan will receive priority on the Waiting List for Affordable (LIHTC) or Subsidized (Section 8) plans, and a move to a new unit may be required.
- For CC Phase I Building: current residents on the Market rental plan may be placed on a transfer list for a different size unit and may move when a unit becomes available (after a one-year period) and after paying the transfer fee.



**Note:** There may be a transfer fee charged for all moves, except those made at the request of management or approved for medical reason, depending upon the relevant rental plan. The amount is subject to change.

### **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 St. 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.

### **Rejecting Ineligible or Unqualified Applicants**

Crown Center reserves the right to reject applicants for admission based on any of the following:

1. Any member of the household fails to respond to management inquires for additional information during the application process.
2. Any member of the household has a record of eviction, lease violations, from any property within the last two years
3. Any member of the household current lives in a Crown Center property.

### **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 and request a phone or in-person meeting. The meeting will be conducted by a Crown staff member different than the person who rejected the applicant.

Following the phone or in-person meeting, Crown Center will respond to the applicant within 10 business days and notify the applicant of the final decision.



## **Questions**

We appreciate your interest in Crown Center for Senior Living. If you have any questions contact our office: (314) 991-2055.

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

## **Independent Student Status**

*A final rule was recently published 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 from his or her parents upon review and the parents are eligible for Section 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 from 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.*

*All applicants will be required to complete a Student Certification Form at initial occupancy and annually.*



