

Big Island Housing Foundation  
HALE MAKANA 'O NANAKULI  
TENANT SELECTION PLAN

LIHTC & RD



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TENANT SELECTION PLAN – Hale Makana ‘O Nanakuli – Incl. VAWA

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<b>I.</b>	<b>PROJECT ELIGIBILITY REQUIREMENTS</b>	
	<p><u>Qualifying For Admission</u></p> <p>Management will not admit ineligible Applicants. In order to be eligible, a household must meet the eligibility criteria set forth by the individual property. This criteria is used to demonstrate the Applicant’s suitability as a resident by using verified information on past behavior to document the Applicant’s ability to comply with essential lease provisions and any other rules governing tenancy.</p> <p>Applicants will be screened on past habits and practices related to tenancy and not on any attributed behavior which may be related to a particular group or category of persons of which an Applicant may be a member.</p> <p>A Household is eligible for assistance only if the unit will be the household’s only place of residence. This prohibition does not prevent a person who is currently receiving assistance from applying for an assisted unit at another property. The assisted tenancy in the unit being vacated must end the day before the subsidy begins in the new unit.</p> <p><u>Who Qualifies:</u></p> <p>Applicants whose household annual income does not exceed established income limit appropriate for the program type for the property and the household size established by Management. Household is defined as:</p> <ol style="list-style-type: none"> <li>1. A single individual, with or without children, including those who are pregnant at the time of application or in the process of securing legal custody of any individual under 18;</li> <li>2. Two or more persons living together, whose combined income does not exceed the established income limit; or</li> <li>3. Other persons, including foster children, live-in attendants, and members who are temporarily absent and may be considered a part of the household if they are living or are going to be living at the housing site.</li> </ol>	
	<b>A.</b>	<b>Project Specific Requirements</b>
	To meet the Low Income Housing Tax Credits (LIHTC) and Rural Development (RD) eligibility requirements, an Applicant or tenant must fall within the following guidelines for :	
	<b>Multi-Family Housing Site: Hale Makana O’Nanakuli</b>	Applicants who meet the minimum income limit guidelines published by the IRS, as applicable, may qualify for housing at BIHF managed multi-family housing sites.
	<b>B.</b>	<b>Citizenship/Immigration Status Requirements</b>
	<p>Only U.S. citizens and eligible non-citizens may benefit from federal rental assistance. Compliance with these rules ensures that only eligible families receive subsidy. These requirements apply to households making application to the property, households on the waiting list and tenants. Applicants must prove U.S. Citizenship, naturalization or legal non-citizen status for each household member. Households that have no members with citizenship, naturalization or legal non-citizen status do not qualify for assistance.</p> <ol style="list-style-type: none"> <li>1. Verification of Citizenship/Immigration Status</li> </ol>	

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	<ul style="list-style-type: none"> <li>a. Non-citizens claiming eligible status must provide:             <ul style="list-style-type: none"> <li>1) A signed declaration of eligible immigration status;</li> <li>2) A signed consent form; and</li> <li>3) One of DHS-approved documents.</li> </ul> </li> <li>b. Non-citizens not claiming eligible immigration status must:             <ul style="list-style-type: none"> <li>1) Sign a declaration that they do not claim to have eligible status.</li> </ul> </li> <li>c. Pro-rated assistance is available to households:             <ul style="list-style-type: none"> <li>1) Which include at least one member with citizenship, naturalization or legal non-citizen status that has been verified through the DHS (Department of Homeland Security);</li> <li>2) Delay of assistance is prohibited: the Owner must provide assistance to the family member determined to be eligible and to those family members who submit their immigration documents on time; if any family members did not provide the required immigration documentation, assistance for the family must be prorated.</li> </ul> </li> <li>d. Applicants who hold a non-citizen student visa:             <ul style="list-style-type: none"> <li>1) Are ineligible for assistance.</li> </ul> </li> </ul> <p>2. Once the determination of status of a household has been made, Management will:</p> <ul style="list-style-type: none"> <li>a. Provide full assistance to a household that has established the eligibility of all of its members.</li> <li>b. Offer continued prorated assistance to a mixed household, or temporary deferral of termination of assistance if the household does not accept the offer of prorated assistance; or</li> <li>c. Offer temporary deferral of termination of assistance to an eligible household. At the end of the deferral period the household must either pay market rent or vacate the unit.</li> <li>d. Place households whose number of household members is appropriate for the unit size.</li> <li>e. Place those households who meet the eligibility criteria for the project set forth in this policy.</li> </ul>
C.	<p><b>Social Security Number (SSN) Requirements</b></p>
	<ul style="list-style-type: none"> <li>1. <b>FAILURE TO COMPLY.</b> A household that fails to comply with Social Security Number requirements is subject to eviction: if a Tenant fails to meet the SSN disclosure, documentation, and verification requirements, management “must terminate the tenancy” of both the Tenant and the Tenant’s household because the household has failed to comply with its lease.</li> <li>2. <b>APPLICANT:</b> Each Applicant must supply their Social Security Number. This requirement must be met for all members of the household prior to move in.             <ul style="list-style-type: none"> <li>a. Applicants do not need to disclose or provide verification of a SSN for all non-exempt household members at the time of application and for placement on the waiting list. However, Applicants must disclose and provide verification of a SSN for all non-exempt household members before they can be housed.</li> <li>b. If all non-exempt household members have not disclosed and/or provided verification of their SSNs at the time a unit becomes available, the next eligible Applicant must be offered the available unit.</li> <li>c. The Applicant who has not disclosed and/or provided verification of SSNs for all non-exempt household members has 90 days from the date they are first offered an available unit to disclose and/or verify the SSNs. During this 90-day period, the Applicant may, at</li> </ul> </li> </ul>

his/her discretion, retain his/her place on the waiting list. After 90 days, if the Applicant is unable to disclose and/or verify the SSNs of all non-exempt household members, the Applicant should be determined ineligible and removed from the waiting list.

d. The SSN requirements do not apply to individuals who do not contend eligible immigration status:

- 1) **Mixed Families:** For projects where the restriction on assistance to noncitizens applies and where individuals are required to declare their citizenship status, the existing regulations pertaining to proration of assistance or screening for mixed families must continue to be followed. In these instances, the Owner will have the tenant's Citizenship Declaration on file whereby the individual did not contend eligible immigration status to support the individual not being subject to the requirements to disclose and provide verification of a SSN. NOTE: The O/A may not deny assistance to mixed families due to nondisclosure of a SSN by an individual who does not contend eligible immigration status.

NOTE: State law prohibits an individual (head of household with other eligible household members) with ineligible immigration status from executing a lease or other legally binding contract.

### 3. TENANT

#### a. Existing Tenants as of January 31, 2010:

- 1) Existing tenants age 6 or older (except those age 62 or older as of January 31, 2010) must submit to Management the complete and accurate SSN assigned to the participant and to each member of their household at the next interim. Documentation of the numbers must be submitted.
  - a) If they have not previously disclosed a SSN;
  - b) If they previously disclosed a SSN that the Social Security Administration determined to be invalid;
  - c) If they have been issued a new SSN.
- 2) If a tenant fails to provide a valid and verified SSN, the household is subject to termination of tenancy in accordance with 24 CFR 5.218.

#### b. Individuals Age 52 or Older as of January 31, 2010:

- 1) If an individual is 62 or older as of January 31, 2010 and their initial determination of eligibility was begun before January 31, 2010, they are exempt from the disclosure of a SSN. The eligibility determination is based on participation in either PIH or MF HUD assisted programs.
- 3) When determining the eligibility of an individual who meets the exception requirements for SSN disclosure and verification, documentation must be obtained from the owner of the property where the initial determination of eligibility was determined prior to January 31, 2010, that verifies the Applicant's exemption status. This documentation must be retained in the tenant file. An O/A must not accept a certification from the Applicant stating they qualify for the exemption.

#### c. Under Age 6: Adding a New Household Member Under Age 6 to an Existing Family:

- 1) **With a SSN:** When adding a household member who is a child under the age of six with a SSN, the child's SSN must be disclosed and verification provided at the time of processing the recertification of family composition that includes the new household

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	<p>member.</p> <p>2) Without a SSN: If the child does not have a SSN, the O/A must give the household</p> <ol style="list-style-type: none"> <li>a) Delay examples include but are not limited to: delayed processing of SSN application by SSA, natural disaster, death in family, etc.</li> <li>b) During this time period, the child is to be included as part of the household and will receive all of the benefits of the program in which the tenant is involved, including the dependent deduction.</li> </ol> <p>3) If a tenant fails to provide a valid and verified SSN within the timetable provided above, the household is subject to termination of tenancy in accordance with 24 CFR 5.218.</p> <p>4. FOSTER CHILDREN – See Item III.F.</p> <p>5. LIVE-IN AIDES – See Item III.G.</p>
<b>II .</b>	<b>INCOME LIMITS - LIHTC (Low Income Housing Tax Credit) INCOME LIMITS</b>
A.	<p>Management must comply with the IRS and State of Hawaii HHFDC (Hawaii Housing Finance &amp; Development Corporation) guidelines governing LIHTC properties.</p> <p>In compliance with IRS regulations, 40% or more of <b>Hale Makana O’Nanakuli’s</b> aggregate residential rental units will be occupied by individuals with incomes of 60% or less of the area median gross income, as adjusted for family size.</p> <p>Owners are required to implement the new income limits no later than 45 days after the effective date.</p>
<b>III</b>	<b>PROCEDURES FOR RECEIVING APPLICATIONS AND SELECTING FROM THE WAITING LIST</b>
A.	<b>Receiving Applications</b>
	<ol style="list-style-type: none"> <li>1. Management may send out and receive applications by mail at the office or by email, and will make reasonable accommodations for persons with disabilities, if requested.</li> <li>2. Applications must be made on Management’s properly prescribed form in order to be considered.</li> <li>3. Should the Applicant be personally unable to complete the form, the person assisting the Applicant must sign and date the application, indicating it was completed at the direction of the named Applicant.</li> <li>4. Every application must be completed in full. Information not readily available to the Applicant must be so noted on the application form by the Applicant.</li> <li>5. An incomplete application may delay the processing for an available unit.</li> <li>6. Upon receipt, each application is date and time stamped. <ol style="list-style-type: none"> <li>a. At the time application for rental is made, the applications are reviewed for completeness.</li> <li>b. Incomplete applications are returned for completion.</li> <li>c. Applications which are turned in incomplete a 2<sup>nd</sup> time, or are returned unclaimed or undeliverable, are so noted and formally rejected.</li> <li>d. Applicants who do not qualify based on the negative preliminary criminal screening are cancelled and notified of the action.</li> <li>e. Applicants are given an opportunity to appeal the determination.</li> <li>f. Per USDA Regulations, <b>all applications</b> regardless of completeness are recorded by date and time on the waiting list, subject to further screening when a unit becomes available.</li> <li>g. <b>In addition to Management’s Application form, Applicant must also complete a Tax Credit</b></li> </ol> </li> </ol>

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	Application and Interview Checklist.
B.	Preferences
	There are no preferences noted for this property. Marketing and outreach will include special efforts to attract Applicants who are least likely to apply, Applicants with incomes below the extremely low-income limit, and Applicants with incomes below the very low-income limit.
C.	Income Targeting
	1. <b>LIHTC PROPERTIES:</b> The marketing plan applies only to a LIHTC property, <b>Hale Makana O’Nanakuli</b> . Management will be guided by the minimum set-aside (MSA) requirement of 40% of units occupied by individuals with incomes of 60% or less of the area median gross income, adjusted for family size.
D.	Applicant Screening Procedure
	<p>Prior to the date that housing becomes available for occupancy, eligible Applicants are screened, and those who meet the screening criteria will be considered for housing.</p> <ol style="list-style-type: none"> <li>1. <b>Screening:</b> Screening is a determination that an otherwise eligible household has the ability to pay rent on time and to meet the requirements of the lease. All screening criteria are consistently applied to all Applicants in a non-discriminatory manner and in accordance with all applicable fair housing and civil rights laws.</li> <li>2. <b>Cost of Screening:</b> The Owner is responsible for the cost of screening.</li> <li>3. <b>Resident Screening:</b> <ol style="list-style-type: none"> <li>a. All adult Applicants who intend to live in the unit will be screened. “Adult” in this case is defined to comply with State and Federal Laws, the Federal Fair Housing Act, as amended in 1988 and the State’s Fair Housing Practices Act as: <ul style="list-style-type: none"> <li>• 18 years of age or over</li> <li>• Persons married (regardless of age)</li> <li>• Person married at one time and presently divorced (regardless of age)</li> <li>• *A minor (under age 18) who is emancipated from parental control by a court order which includes the capacity to sign a contract,</li> <li>• *A minor (under age 18) who has a child</li> <li>• *A minor (under age 18) who is expecting a child</li> <li>• *A minor (under age 18) who has legal custody of a child</li> <li>• *A minor (under age 18) who is seeking legal custody of a child and the petition has been filed</li> </ul> <p>*Emancipation documents are required.</p> </li> <li>b. Live-in aides, new household members, and police officers, security personnel or managers are subject to the same screening for drug abuse and other criminal activity applied to other Applicants.</li> </ol> </li> <li>4. <b>Verification of Identification Documents:</b> Proof of identity is required of all Applicants. <i>Applicants:</i> <ol style="list-style-type: none"> <li>a. Must be able to provide proof of identity (acceptable documents are a driver’s license, state-issued identification card, etc.);</li> <li>b. Must be able to disclose their Social Security Numbers (SSNs).</li> <li>c. All heads, co-heads, or other persons, including Live-In Aides, meeting the definition of an adult under the age of 18 must bring in approved documentation of</li> </ol> </li> </ol>

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	<p>marriage, custody, and/or emancipation.</p> <p>5. <u>Addition of New Occupants</u>: Adults may be added to the household only after the application for housing has been approved by the Managing Agent, <u>but not within the initial term of the lease</u>.</p> <p>a. Any existing resident wishing to add an adult to their household is expected to have the new occupant complete an application. The new occupant will be required to meet all screening criteria requirements of an Applicant, as listed above.</p> <p>b. New minors added to the lease must have birth certificates, Social Security cards, and custodial documents, if necessary.</p> <p>6. <u>Live-In Aides – See Item III.G.</u></p>
E.	Applicant Screening Criteria
	<p>Screening of all Applicants will include:</p> <p>1. <u>Tenant Housing History</u>: Applicants meeting the screening criteria:</p> <p>a. Have provided complete information regarding their housing history for the past 5 years;</p> <p>b. Have fulfilled their rent and compliance obligations as tenants in previous housing. <i>Note</i>: Owners may not reject an Applicant for lack of a rental history, but may reject an Applicant for a poor rental history.</p> <p>c. Applicants should demonstrate a history or ability to pay their rent on time.</p> <p>d. <b>EXCEPTION</b>: Management will waive the Rental Housing History requirement for Applicants who complete a Rental Program that provides oversight of tenancy, such as the Tenant Solutions program administered by the Office of Social Ministries. An Applicant accepted under this exception is still subject to other screening procedures and compliance with the Lease, House Rules and other Lease Addendums.</p> <p>2. <u>Credit Report Checks</u>: Applicants meeting the screening criteria:</p> <p>a. Should demonstrate a history or ability to pay their rent on time. <b>NOTE</b>: Owners may reject an Applicant for a poor credit history, but a lack of credit history is not sufficient grounds to reject an Applicant.</p> <p>3. <u>LIHTC Household Income Qualification</u>: Applicants must have a household income of <b>at least one-and-a half (1.5) times</b> the LIHTC published rents to be considered for further processing.</p> <p>4. <u>Criminal History Check</u>: All Applicants age 18 and older will be subject to a criminal background check.</p> <p>a. Applicants meeting the screening criteria are those who have no history of criminal activity involving crimes of physical violence to persons or property or other criminal acts which adversely affect the health, safety or welfare of themselves or other Residents or the peaceful enjoyment of the apartment complex.</p> <p>b. <b>Continued tenancy</b> will be determined by Tenants meeting the same screening criteria at each Annual Recertification that is applied to all Applicants for acceptance into housing.</p> <p>5. <u>Alcohol</u>: Applicants meeting the screening criteria:</p> <p>a. Have no household member who abuses or displays a pattern of abuse of alcohol that would interfere with the health, safety or right to a peaceful enjoyment of the premises by other residents;</p> <p>b. The screening standards are based on behavior, not the condition of alcoholism or</p>



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		<p>alcohol abuse.  <i>Note:</i> Owner may consider whether the household member has completed a supervised Alcohol rehabilitation program [proof of completion is required], at least one year prior to the application date.</p> <p>6. <b>Drugs:</b> Applicants meeting the screening criteria:  a. Have no household member who has a history of drug-related activity.  <i>Note:</i> Owner may consider whether the household member has completed a supervised drug rehabilitation program [proof of completion is required], at least one year prior to the application date.</p> <p>7. <b>Sex Offense:</b> Applicants meeting the screening criteria:  a. Have no household member who has a conviction or adjudication other than acquittal, for any sexual offense;  b. Have no household member who is subject to a State or National lifetime sex offender registration program.  c. Any Applicant subject to registration, regardless of length of registration, on the National Sex Offender Registry will be denied admission .  d. Any Tenant subject to registration, regardless of length of registration, on the National Sex Offender Registry will be denied continued Tenancy.</p>
	F.	Foster Children
		<p>1. Applicants must disclose and provide verification of a Social Security Number for a foster child/Management is required to collect and verify the SSN.  a. If a foster parent says they do not have the child’s SSN, Management can ask for a copy of their most recent tax return;  b. If the foster parent claims the fostering agency refused to disclose the foster child’s SSN, Management can contact the fostering agency to confirm;  c. If the fostering agency confirms that it will not disclose the child’s SSN, the fostering agency’s reply should be in writing and will be placed in the Tenant’s file;  d. If fostering agency will not disclose the child’s SSN, Management will obtain advice from the State Housing Compliance Agency.  e. If the foster parent has the child’s SSN but refuses to disclose it, Management “must terminate the tenancy” on both the Tenant and the Tenant’s household.  f. Applicant must provide the dates of birth of foster children/Management is required to collect and verify the dates of birth.  g. Management must offer a foster parent the Race and Ethnic Data Reporting Form: parents and guardians are to complete the form for Tenants under the age of 18, including foster children.  h. Management is not required to screen foster children for drug abuse or criminal activity. If the foster child turns 18 but is already a part of the household they are not considered new additions and therefore do not require screening.  i. Foster children are not required to complete a Citizenship Declaration (Section 214). All family members must complete a Citizenship Declaration, however citizenship information of foster children is not required.</p>
	G.	Live-In Aides
		<p>1. Live-In Aides may be added to the household only after the Aide has been approved by Management.</p>

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	<ol style="list-style-type: none"> <li>2. A Live-In Aide must be an adult or emancipated minor, however a Live-In Aide cannot be the Co-Head or spouse.</li> <li>3. Live-In Aides must supply their Social Security Number/Management must collect and verify a Live-In Aide’s Social Security Number.</li> <li>4. Live-In Aides must supply their date of birth/Management must collect and verify a Live-In Aide’s Social Security Number.</li> <li>5. Management is required to screen Live-In Aides for drug activity and other criminal activity, using the same criteria established for screening other Applicants.</li> <li>6. Live-In Aides are not required to complete the Race and Ethnic Data Reporting Form.</li> <li>7. Live-In Aides are not required to complete a Citizenship Declaration (Section 214) that is otherwise required of all family members.</li> <li>8. Live-In Aides are not listed on the Lease – they are considered service providers, not Tenants—and have no right to Tenancy once their services are no longer needed.</li> <li>9. Live-In Aides are not responsible for rental payments.</li> <li>10. Live-In Aides are subject to complying with the House Rules.</li> <li>11. Adult Children as Live-In Aides: Any Tenant wishing to add an adult child to their household is expected to have the new occupant complete an Application. The new occupant will be required to meet all screening criteria requirements of an Applicant.</li> </ol>
H.	Waiting List
	<ol style="list-style-type: none"> <li>1. Per USDA Regulations, <b>all applications</b> regardless of completeness are recorded on the waiting list by date and time Application is received, subject to further screening when a unit becomes available.</li> <li>2. Preliminary criminal screening is done on Waiting List Applicants.</li> <li>3. Management will indicate the following about each Applicant on the Waiting List:             <ol style="list-style-type: none"> <li>a. Updated information:                 <ol style="list-style-type: none"> <li>1) Name;</li> <li>2) Phone Number;</li> </ol> </li> <li>b. Bedroom size needed;</li> <li>c. Income Level – (EL, VL, L):</li> <li>d. Date and time application was received.</li> </ol> </li> <li>4. Waiting List Changes             <ol style="list-style-type: none"> <li>a. All responses, changes to the application, or refusals must be in writing to maintain an active status.</li> <li>b. If housing becomes available at a project site and the Applicant declines, the Applicant will go to the bottom of the waiting list for the project. Some exceptions may apply due to extenuating circumstances, such as acceptance of a unit contingent on the sale of a residence, completing a lease term in an existing unit, etc., in which case(s) consideration will be given to the Applicant depending on the timing of occupancy and the availability of a unit.</li> <li>c. If an Applicant refuses housing a second time, regardless of the project being refused, the application for all project sites is cancelled. The Applicant must reapply if he/she is interested in the future.</li> <li>d. If housing becomes available at a project site and the Applicant is no longer interested in the project, his/her application will be dropped from the waiting list for the project and the Applicant must reapply if he/she is interested in the project in the future.</li> </ol> </li> </ol>

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		<p>e. Non-response to a processing letter informing the Applicant of an upcoming vacancy at a housing site will automatically cancel the application for all project sites selected by the Applicant.</p> <p>f. <i>Exception:</i> If an Applicant does not respond to a waiting list update due to a disability, they must be reinstated at their original place on the waiting list.</p> <p>5. Determining Eligibility</p> <p>a. The Certified Occupancy Specialists have the primary responsibility for determining eligibility, certifying and recertifying incomes and selecting Residents. The Property Manager has the responsibility of ensuring the Certified Occupancy Specialist follows the Tenant Selection criteria and any eligibility requirements.</p> <p>b. All persons who are responsible for this function will be thoroughly familiar with any governmental requirements and copies of all guidelines and procedures will be in a handbook retained at the main office and /or on the property. This handbook will be revised as regulations and guidelines are changed and the Property Manager will check to ensure that all guidelines are followed. (IRS and State of Hawaii HHFDC guidelines governing LIHTC properties, as applicable.)</p> <p>6. Selection Procedure</p> <p>a. Selection from the Waiting List will be by date and time and the following order:</p> <ol style="list-style-type: none"> <li>1) Very low-income applicants;</li> <li>2) Low-Income applicants;</li> <li>3) Moderate-income applicants.</li> </ol> <p>7. Zero Income</p> <p>a. Rural Development does not accept a Tenant Certification for an Applicant or Tenant with zero income unless all income is specifically exempted.</p> <p>b. In cases where an Applicant/Tenant claims to have no household income nor anticipate a source of income, the Applicant/Tenant needs to demonstrate financial capability to meet other basic living expenses such as food, clothing, diapers, transportation and other nonessentials such as phone, cable, internet, etc. The basis for this income must be documented in the file.</p> <p>c. It is the Tenant’s responsibility to immediately report changes in income to management.</p> <p>d. The Owner/Agent must review the Tenant’s circumstances quarterly to ascertain changes.</p> <p>8. Letter of Priority Entitlement (LOPE)<sup>1</sup></p> <p>a. Persons displaced by USDA action, or displaced persons in a Federally declared disaster area have priority over all other applicants of the individual applicant’s income group.</p> <p>b. A LOPE will provide the Tenant with priority entitlement to rental units in other Agency [USDA]-financed projects for 120 days from the date of the LOPE; a tenant may request that the LOPE entitlement period be extended if tenants need additional time to secure replacement housing.</p>
<b>IV.</b>		<b>CRITERIA FOR REJECTING APPLICANTS</b>
	A.	Rejection of an Applicant
		An Owner may reject an application for tenancy if a review of the information about the Applicant indicates that the Applicant will not be a suitable tenant. The term “Applicant” includes any member or Live-In Aide living in the household, over the age of 18, or under 18

<sup>1</sup> USDA Handbook Letter 201

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	<p>with approved documentation of marriage, custody, and/or emancipation. An Applicant may be rejected or cancelled for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Application is incomplete;</li> <li>2. Applicant falsified any part of the rental application, by omission or otherwise, including name, Social Security Number, household composition, tenant housing history or criminal record, regardless of who completed the application;</li> <li>3. Applicant does not meet the LIHTC criteria specified for the project site;             <ol style="list-style-type: none"> <li>a. Household income exceeds LIHTC program income limits.</li> <li>b. Household income does not meet the criteria of <b>at least one-and-a-half (1.5) times the LIHTC published rents.</b></li> </ol> </li> <li>4. Household composition does not conform to units available on property;</li> <li>5. Applicant has a negative housing history;</li> <li>6. Applicant has a negative credit history;</li> <li>7. Applicant has a negative criminal history;</li> <li>8. Housing would not be the Applicant’s only place of residence;</li> <li>9. Applicant withdrew the application voluntarily;</li> <li>10. Management was unable to contact the Applicant by phone or mail;</li> <li>11. Applicant failed to renew the active status of the application within the prescribed time frame, on notification of proposed cancellation. Non-response will automatically cancel the application for all project sites selected by the Applicant.</li> </ol>
B.	<p><b>LIHTC – Eligibility Restrictions Regarding Students</b></p>
	<ol style="list-style-type: none"> <li>1. Not LIHTC Eligible: The household is ineligible under LIHTC if everyone in the household is a full-time student, defined by the IRS as taking 12-credit hours a semester or attending school full-time 5 months per year at an educational institution with regular facilities (other than a correspondence or night school).             <ol style="list-style-type: none"> <li>a. The student status is monitored on a tax-year basis (per the IRS), thus an Applicant would not be eligible if the Applicant had been a full-time student for 5 months of the tax year, even if they were not a student at the time of applying for an LIHTC unit.</li> </ol> </li> <li>2. Exceptions: A unit would not be disqualified for tax credits if it is occupied as specified in Section 42(i)(3)(D):             <ol style="list-style-type: none"> <li>a. Section (i): By an individual who is:                 <ol style="list-style-type: none"> <li>1) A student and receiving assistance under title IV of the Social Security Act;</li> <li>2) A student who was previously under the care and placement responsibility of the State agency responsible for administering a plan under part B or part E of title IV of the Social Security Act (foster care), or</li> <li>3) A student enrolled in a job training program receiving assistance under the job Training Partnership Act or under other similar Federal, State or local laws, or</li> </ol> </li> <li>b. Section (ii): Entirely by full-time students if such students are:                 <ol style="list-style-type: none"> <li>1) Single parents and their children and such parents are not dependents (as defined in section 152) and the children are not dependents of another individual other than the parents, or</li> <li>2) Married and file a joint return.</li> </ol> </li> </ol> </li> </ol>
C.	<p><b>Eligibility Restrictions – Criminal History</b></p>
	<p>If an Applicant marked “No” on “Part III-Criminal History”, and the Applicant(s) has <u>any</u> criminal history—with the exception of minor traffic violations (such as parking tickets)</p>

—the application will be considered fraudulent and the Applicant(s) will be denied housing, regardless of who completed the application. (“Applicant” includes any member or Live-In Aide living in the household, over the age of 18, or under 18 with approved documentation of marriage, custody, and/or emancipation). If an Applicant is denied admission based on a negative criminal history, the Applicant will be provided with a copy of the information the action is based on.

1. Under the Hawaii Penal Code, crimes are of three grades according to their seriousness: petty misdemeanors, misdemeanors, and felonies.
  - a. **Petty misdemeanor** [*fine not exceeding \$1,000 and/or imprisonment of not more than 30 days*]:
    - 1) No more than **one petty misdemeanor** ~~in a 2-year period and not~~ within **2-years** of the application date.
    - 2) Exception: Petty misdemeanor crimes that involve physical violence or threats of violence against persons, i.e. terroristic threatening, abuse of a household/ household member, assault, etc. No more than **one such petty misdemeanor** in any **10-year period** and not within **10 years** of the application date.
  - b. **Misdemeanor** [*fine not exceeding \$2,000 and/or imprisonment of not more than one year*]:
    - 1) No more than **one misdemeanor** within **5-years** of the application date; Felony Conviction [*Class A-Fine exceeding \$50,000 and/or imprisonment of not more than 20 years; Class B- Fine not exceeding \$25,000 and/or imprisonment of not more than 10 years; Class C- Fine not exceeding \$10,000 and/or imprisonment of not more than 5 years*];
    - 2) No more than **one felony** conviction in a lifetime and not within a **20-year** period of the application date after being paroled from incarceration.
2. DUIs and DWIs: Driving Under the Influence or Driving While Intoxicated are considered misdemeanors and not “moving violations” or “traffic citations”.
3. TROs: No Temporary Restraining Orders shall have been filed by or against Applicant within 5 years of the application date, due to the possible threat posed to other tenants. **EXCEPTION:** Management may request an Applicant to certify that he/she is a victim of domestic violence, dating violence or stalking and that the incidence(s) of threatened or actual abuse [related to the TRO(s)] are bona fide in determining whether the protections afforded under the VAWA are applicable.
4. Contempt of Court: Contempt of Court citations are counted as petty misdemeanors or misdemeanors.
  - a. No more than one *petty misdemeanor* in a 5-year period and not within 5 years of the application date; or
  - b. No more than one *misdemeanor* in any 10 year period and not within 10 years of the application date.
5. Outstanding Warrants: No Applicant with an outstanding warrant.
6. Incarceration:
  - a. No incarceration of 6 months or less, within 10 years of the application date after release from incarceration. Length of incarceration is “time-served”, not length of time sentenced.
  - b. No incarceration lasting more than 6 months, within 20 years of the application date

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	<p>after release from incarceration. Length of incarceration is “time-served”, not the length of time sentenced.</p> <p>7. Probation or Parole: No Applicant currently on probation or parole.</p> <p>8. Alcohol: An application would be denied if a household member’s abuse or pattern of abuse of alcohol would interfere with the health, safety or right to peaceful enjoyment of the premises by other residents.</p> <p>9. Drugs:</p> <p>a. No drug related offenses, except persons who have satisfactorily completed, <b>beyond one year</b>, an approved supervised drug rehabilitation program after the last drug related conviction and not within the time limits of other convictions as listed above.</p> <p>b. No household member must be currently engaged in the illegal use of drugs or show reasonable cause for Owner to believe that a member’s illegal use or pattern of illegal use of drugs may interfere with the health, safety, or peaceful enjoyment by other residents.</p> <p>c. A household containing a member who was evicted in the last <b>three years</b> from Federally assisted housing for drug-related criminal activity is prohibited from admission, with the following exceptions:</p> <p>1) The evicted household member has successfully completed an approved, supervised drug rehabilitation program at least one year prior to the date of application [proof of completion is required];</p> <p>2) The circumstances leading to the eviction no longer exists (eg the household member no longer resides with the Applicant household).</p> <p>10. Sex-Related Crimes:</p> <p>a. No household member who has a conviction or adjudication other than acquittal, for any sexual offense;</p> <p>b. No sex related crime that results in any Applicant subjected to a lifetime registration requirement under a State sex offender registry.</p> <p>11. Murder: No murder or attempted murder <del>arrest or</del> conviction.</p> <p>12. Time Frames: Unless otherwise stated, all time frames are from the date of <del>arrest or</del> conviction and not the date the criminal action took place.</p> <p>13. Cancellation While on Waitlist: Any <del>arrest or</del> conviction of an Applicant while on any waitlist will result in cancellation of the application. If the Managing Agent determines that any Applicant is currently engaging in illegal use of a drug or abuse of alcohol, or determines it has reasonable cause to believe that an Applicant’s illegal use or pattern of illegal use of a drug or abuse of alcohol may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents, the application may be cancelled. <del>The Managing Agent may make the determination regardless of whether an Applicant has been arrested or convicted for such activity and without the need to satisfy a criminal conviction or standard of proof of the activity.</del></p>
V.	<b>APPEALING A REJECTION/CANCELLATION</b>
A.	If an Applicant disagrees and/or wishes to discuss the cancellation of a rental application, the Applicant has fourteen (14) days from the date of the cancellation letter in which to contact the Managing Agent’s office to appeal the cancellation with the Property Manager.
B.	The Applicant may dispute the accuracy and relevance of the information obtained from any law

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		enforcement agency.
	C.	Persons with disabilities have the right to request reasonable accommodations to participate in the informal hearing process.
	D.	If an Applicant is a person with disabilities, the Owner must consider extenuating circumstances – as a matter of reasonable accommodation—to accept the Applicant whom the Owner would normally reject. A reverse policy—to reject an Applicant who was determined to be eligible—does not apply.
	E.	A Grievance may be submitted to Rural Development for review or a hearing process if the Tenant Selection Plan guidelines are not clear or if a resolution is not reached, or if other methods of resolving a Grievance are not in place.
<b>VI.</b>	<b>REINSTATEMENT/REAPPLICATION</b>	
	A.	Reinstatement. If an Applicant is removed from the waiting list and the Owner determines that an error was made in removing the Applicant (e.g. the incorrect address was used in sending mail to the Applicant, or the Applicant did not respond to information or updates because of a disability), the Applicant will be reinstated at the original place on the waiting list.
	B.	Cancellation Based on Non-Response. Applicants cancelled due to non-response may reapply at <b>any time</b> , with no prejudice or preference shown to Applicant. The application will be treated as a new application, subject to screening procedures.
	C.	Cancellation Based on Negative Housing or Credit History. Applicants cancelled due to negative housing or credit history may reapply <b>no less than one year</b> from the date of cancellation--background checks should be able to show 5 years of acceptable housing and credit history.
	D.	Cancellation Based on Negative Criminal History. Applicants cancelled due to negative criminal history may reapply <b>no less than 1 year</b> from the date of cancellation.
<b>VII.</b>	<b>OCCUPANCY STANDARDS</b>	
		<p>1. The following occupancy standards are used for management’s properties:</p> <p>Studio (Efficiency): At least 1 but no more than 2 people;</p> <p>One-bedroom units: At least 1 but no more than 3 people;</p> <p>Two bedroom units: At least 2 but no more than 5 people;</p> <p>Three bedrooms: At least 3—of which at least one is an adult and the other two of the three are 13 years or older— but no more than 7 people.</p> <p>2. Counted as Family Members are:</p> <p>a. All full-time members of the family;</p> <p>b. All anticipated children;</p> <p>c. Children who are away at school who live at home during recesses; however not counted are children who are away at school, who have established residency at another address or location as evidenced by a lease agreement; the new address or location is considered the student’s principle place of residence;</p> <p>d. Live-in aides for the purposes of determining appropriate unit size;</p> <p>e. Foster Children living in the unit;</p> <p>f. Foster Adults living in the unit.</p> <p>3. Assigning Smaller Units Than Required: A family may be assigned to a smaller unit than stated in the occupancy standards if the family requests the smaller unit and all of the following apply:</p> <p>a. The family is eligible for the smaller unit based on the number of family members, and occupancy of the smaller unit will not cause serious overcrowding;</p>

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		<ul style="list-style-type: none"> <li>b. Assigning a smaller unit results in a lower rent payment for the occupant in a Section 236 or BMIR property; and</li> <li>c. The assignment will not conflict with local codes.</li> </ul> <p>4. Assigning Units Larger Than Required: A family may be assigned a larger unit than stated in the occupancy standards if one of the following conditions exists:</p> <ul style="list-style-type: none"> <li>a. No eligible family in need of the larger unit is available to move into the unit within 60 days, the property has a proper size unit for the family but it is currently unavailable and the family agrees in writing to move at its own expense when a proper size unit becomes available;</li> <li>b. A family needs a larger unit as a reasonable accommodation for a family member who is a person with a disability.</li> </ul> <p>5. A single person must not be permitted to occupy a unit with two or more bedrooms, except:</p> <ul style="list-style-type: none"> <li>a. A person with a disability who needs the larger unit as a reasonable accommodation;</li> <li>b. A displaced person when no appropriately sized unit is available;</li> <li>c. An elderly person who has a verifiable need for a larger unit;</li> <li>d. A remaining family member of a resident family when no appropriately sized unit is available.</li> </ul>
<b>VIII.</b>	<b>UNIT TRANSFER POLICIES</b>	
	<b>A.</b>	<b>Transfer Policies</b>
		<ul style="list-style-type: none"> <li>1. Transfers may be made within the same property.</li> <li>2. The request to transfer does not guarantee approval.</li> <li>3. With the exception of the request to transfer due to medical reasons, every Applicant must meet the program requirements for the site in which they intend to reside, the requesting tenant must be current on their lease rent and the existing unit must be maintained in an acceptable condition.</li> <li>4. With the exception of the request to transfer due to medical reasons, every Tenant requesting a transfer must not have incurred a violation from Management within the most current six (6) months.</li> <li>5. A Tenant may not break their Lease at one property to transfer to another property; they must fulfill their initial lease term prior to transfer.</li> <li>6. If a transfer request has been made but the Tenant declines to move when a unit becomes available, the Tenant will be dropped from the list for that project.</li> <li>7. Transfers for medical reasons will take precedence over a transfer that is determined by over/under occupancy.</li> <li>8. Transfers may be requested by Management to meet program requirements for the site or make reasonable accommodations: <ul style="list-style-type: none"> <li>a. Unit transfers for under-housed Residents;</li> <li>b. Residents requiring accessibility features/a transfer deemed necessary based on certified medical reasons;</li> <li>c. Unit transfer for over-housed Residents.</li> </ul> </li> </ul>
	<b>B.</b>	<b>Tenant Transfer Criteria</b>
		<p>Tenant transfers must meet one of the following criteria:</p> <ul style="list-style-type: none"> <li>1. <u>A Unit Transfer for a Medical Reason Certified by a Doctor</u> <ul style="list-style-type: none"> <li>a. Tenants will be put on an in-house transfer list until a unit can be made available to accommodate the household’s request due to medical reasons.</li> </ul> </li> <li>2. <u>A Unit Transfer Based on the Need for an Accessible Unit</u></li> </ul>



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	<ul style="list-style-type: none"> <li>a. For units accessible to or adaptable for persons with mobility, visual or hearing impairments, households containing at least one person with such impairment will have the first priority (as applicable for a particular unit’s feature).</li> <li>b. Current residents requiring accessible/adaptable units shall be given priority over Applicants requiring the same type unit.</li> <li>c. If a tenant household is being moved to a different unit as a reasonable accommodation to a household member’s disability, the Owner shall pay for the move unless doing so would constitute an undue financial and administrative burden. Moving costs include moving (but not packing) household items and furniture, and covering the costs of utility, phone and cable transfers.</li> <li>d. If non-disabled persons are moved into units designed to meet special needs, they shall do so only after signing a lease addendum agreeing to move to another unit with no such design features should an Applicant or current resident require an accessible unit of the type currently occupied by the non-disabled person. In these cases, the cost to move to a non-special design unit shall be paid for by the Owner.</li> </ul> <p>3. <u>Transfer Because of Household Size</u></p> <ul style="list-style-type: none"> <li>a. Tenants will be put on an in-house transfer list if there is no unit available that can accommodate the household at the time of the change in the household composition.</li> </ul> <p>4. <u>A New Unit Because of Changes in Household Composition</u></p> <ul style="list-style-type: none"> <li>a. Tenants will be put on an in-house transfer list if there is no unit available that can accommodate the household at the time of the change in the household composition.</li> </ul> <p>5. <u>A Deeper Subsidy</u></p> <ul style="list-style-type: none"> <li>a. Tenants will be put on an in-house transfer list if there is no unit available that can accommodate the household at the time of the change in the household subsidy.</li> </ul>
<b>IX.</b>	<b>POLICIES TO COMPLY WITH SECTION 504 OF THE REHABILITATION ACT OF 1973 AND THE FAIR HOUSING ACT AMENDMENTS OF 1988</b>
A.	Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance.
B.	Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in any program or activity receiving federal financial assistance.
C.	Title VIII of the Civil Rights Act of 1968 (also known as the Fair Housing Act of 1988, as amended), prohibits discrimination in housing and housing-related transactions based on race, color, religion, sex, national origin, disability and familial status. It applies to housing, regardless of the presence of federal financial assistance.
D.	<p><b>FAIR HOUSING &amp; EQUAL OPPORTUNITY STATEMENT OF NON-DISCRIMINATION</b></p> <p>It is the policy of Big Island Housing Foundation (“Management”) to fully comply with Title VI of the Civil Rights Act of 1964, Title VIII and Section 3 of the Civil Rights Act of 1968 (As amended by the Community Development Act of 1974), Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and any legislation protecting the individual rights of residents, Applicants or staff which may subsequently be enacted.</p> <p>Management will not discriminate because of race, color, sex, religion, handicap, disability, or national origin in the leasing, rental, or other disposition of housing or related facilities, (including land), included in any Development or Developments under its jurisdiction or in the national origin.</p>

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	<p>Management will not on any account of race, color, sex, religion, age, handicap, disability or national origin:</p> <ol style="list-style-type: none"> <li>1. Deny any eligible Applicant the opportunity to lease housing suitable to their needs;</li> <li>2. Provide housing which is different than that provided to others;</li> <li>3. Subject a person to segregation or disparate treatment;</li> <li>4. Restrict a person’s access to any benefit enjoyed by others in connection with the housing program;</li> <li>5. Treat a person differently in determining eligibility or other requirements of admission;</li> <li>6. Deny a person access to the same level of services; or</li> <li>7. Deny a person the opportunity to participate in a planning or advisory group which is an integral part of the housing program.</li> </ol> <p>Management and the Owners of its managed properties do 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.</p> <p>Management will not automatically deny admission to a particular group or category of otherwise eligible Applicants (e.g., families with children born out of wedlock, elderly pet owners, or families whose head or spouse is a student). Each Applicant in any particular group or category will be treated on an individual basis.</p> <p>Management will seek to identify and eliminate situations or procedures which create a barrier to equal housing opportunities. In accordance with Section 504, Management will make reasonable accommodations for individuals with handicaps or disabilities. Such accommodations may include changes in the method of administering policies, procedures, or services.</p> <p>In addition, Management may perform structural modifications to housing and non-housing facilities on our sites where such modifications would be necessary to afford full access to the housing program for qualified individuals. In reaching a reasonable accommodation with, or performing structural modifications for otherwise qualified individuals with handicaps, Management is not required to:</p> <ol style="list-style-type: none"> <li>1. Make structural alterations that require removal or altering of load-bearing structures;</li> <li>2. Provide an elevator in any multifamily housing project solely for the purpose of locating accessible units above or below the grade level;</li> <li>3. Provide support services that are not already part of its housing programs;</li> <li>4. Take any action that would result in a fundamental alteration in the nature of the program or service; or</li> <li>5. Take any action that would result in an undue financial and administrative burden upon any of our managed sites (including structural impracticality as defined in the Uniform Federal Accessibility Standards (UFAS)).</li> </ol>
E.	<p>Affirmative Fair Housing Marketing Plan (AFHMP) – Owners have on file an AFHMP, approved by HUD. Owners must review their AFHMP every 5 years. If the plan is not meeting its objectives or if demographics have changed, the AFHMP must be updated.</p>
X.	<p><b>LIMITED ENGLISH PROFICIENCY (LEP) SERVICES – Exec Order #13166, 1/22/07</b></p>
	<p>The Owner’s responsibility to market projects to those least likely to apply includes marketing to the LEP population in the community. Owners will take reasonable steps to ensure meaningful access to the information &amp; services being provided to persons with limited English proficiency. This may include interpreter services and/or written materials translated into other languages.</p>

<p><b>XI.</b></p>	<p><b>VIOLENCE AGAINST WOMEN [VAWA 2005] &amp; REAUTHORIZATION ACT OF 2013 [VAWA 2013]</b></p>
	<p>The VAWA protects families applying for or receiving rental assistance payments under Rural Housing assistance [under 42 US Code Section 1485<sup>2</sup> or 42 US Code Section 1490<sup>3</sup>] and the Low Income Housing Tax Credit Program [under Section 42 of title 26<sup>4</sup>]. The VAWA provides legal protections to victims of domestic violence, dating violence or stalking. These protections prohibit Management from evicting or terminating assistance from individuals if the asserted grounds for such action is an instance of domestic violence, dating violence or stalking.</p> <p>Under VAWA, being a victim of domestic violence is not a basis for the denial of assistance or for admission to public or Federally assisted housing, so long as the Applicant is otherwise qualified. The VAWA provides that Management may request an Applicant/Tenant to certify that he/she is a victim of domestic violence, dating violence or stalking and that the incidence(s) of threatened or actual abuse are bona fide in determining whether the protections afforded under the VAWA are applicable.</p> <ol style="list-style-type: none"> <li>1. Management may not consider incidents of domestic violence, dating violence or stalking as serious or repeated violations of the lease or other “good cause” for termination of assistance, tenancy or occupancy rights of the victim of abuse.</li> <li>2. Management may not consider criminal activity directly relating to abuse, engaged in by a member of a Tenant’s household or any guest or other person under the Tenant’s control, cause for termination of assistance, tenancy, or occupancy rights if the Tenant or an immediate member of the Tenant’s family is the victim or threatened victim of that abuse.</li> <li>3. Management may request in writing that the victim, or a family member on the victim’s behalf, certify that the individual is a victim of abuse and that the Certification of Domestic Violence, Dating Violence or Stalking, Form HUD-91066, or other documentation as noted on the certification form, be completed and submitted within 14 business days, or an agreed upon extension date, to receive protection under the VAWA. Failure to provide the certification or other supporting documentation within the specified timeframe may result in eviction.</li> <li>4. The Certification for HUD-91066 will be made available to all eligible families at the time of admission, or in the event of an incident of domestic violence, dating violence or stalking that could potentially have an impact on a Tenant’s participation in the housing program, Management may request in writing that an individual complete, sign and submit the form within 14 business days.</li> <li>5. By signing the Certification, the signatory is attesting, under penalty of perjury (28 U.S.C. Sec. 1746) to his/her belief that the information being provided is true and represents bona fide abuse.</li> <li>6. Assistance may be terminated or a lease “bifurcated” (divide a lease so that certain tenants can be evicted while the remaining family members’ lease are allowed to remain intact).</li> <li>7. The provisions protecting victims of domestic violence, dating violence or stalking</li> </ol>

<sup>2</sup> “Housing & Related Facilities for Elderly Persons & Families and Families of Low Income”

<sup>3</sup> “Loan Guarantees for MF Rental housing in Rural Areas.”

<sup>4</sup> IRS Code.

	<p>engaged in by a member of the household may not be construed to limit Management, when notified, from honoring various court orders issued to protect the victim or address the distribution of property in case a family breaks up.</p> <p>8. The VAWA protections shall not supersede any provision of federal, state or local law that provides greater protection for victims of domestic violence, dating violence or stalking – the laws offering greater protection shall be applied.</p> <p><u>Under Rural Development Notice RD AN No. 4747 (1944-N), Attachment B, dated 2/10/2014:</u></p> <ol style="list-style-type: none"> <li>1. Tenants who are actual or imminent victims of domestic violence shall be permitted by the owner or Manager to transfer to another available and safe dwelling unit assisted under the MFH Program covered by this AN when a transfer is requested by a Tenant, and (1) the Tenant reasonably believes that he or she is threatened with imminent harm from further violence if he /she remains within the same dwelling; and (2) in the case of a Tenant who is a victim of sexual assault, the sexual assault occurred on the premises during the 90-day period preceding the request for transfer.</li> <li>2. Tenants requesting an emergency transfer under the VAWA Act may receive benefits under 49 U.S.C. part 24, “Uniform Relocation Assistance and Real Property Acquisition Act”, by requesting a Letter of Priority Entitlement from the Agency, as Rural Development considers this to be a situation beyond the Tenant’s control under 7 CFR 3560.159 (c).</li> <li>3. 7CFR 3560.159 states, “If occupancy is terminated due to conditions which are beyond the control of the Tenant, such as a condition related to required repair or rehabilitation of the building, or a natural disaster, the Tenants who are affected by such a circumstance are entitled to benefits under the Uniform Relocation Act and may request a Priority Entitlement (LOPE) from the Agency. If Tenants need additional time to secure replacement housing, the Agency may, at the Tenant’s request, extend the LOPE entitlement period.”</li> <li>4. Reasonable confidentiality measures are incorporated by Owners and Managers so that the location of the new dwelling is not disclosed to the person that commits an actual or imminent act of violence.</li> </ol>
<p><b>XII.</b></p>	<p><b>PRIVACY POLICY</b></p>
	<p>It is the policy of Management to guard the privacy of individuals conferred by the Federal Privacy Act of 1974, and to ensure the protection of such individuals’ records maintained at our sites. Managing Agent will dispose of Applicant and tenant files and records in a manner that will prevent any unauthorized access to personal information, e.g. shredding. Neither the Property nor its agents shall disclose any personal information contained in its records to any person or agency unless the individual has given written consent to such disclosure. The Applicant’s or tenant’s file is available for review by the Applicant or tenant upon request or by a third party who provides signed authorization for access to the file from the Applicant or tenant. This privacy policy in no way limits the ability to collect such information as it may need to determine eligibility, compute rent, or determine an Applicant’s suitability for tenancy. Consistent with the intent of Section 504 of the Rehabilitation Act of 1973, any information obtained on handicap or disability will be treated in a confidential manner.</p>

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<b>XIII.</b>	<b>POLICY FOR OPENING AND CLOSING THE WAITING LIST</b>
	<ol style="list-style-type: none"> <li>1. <u>Closing the Waiting List:</u> The waiting list remains open. No policy is in effect for closing the waiting list.</li> <li>2. <u>Methods of Advertising:</u> <ol style="list-style-type: none"> <li>a. Availability of housing is advertised in the newspapers(s) for the County of Hawaii in accordance with the site’s Affirmative Fair Housing Marketing Plan, as approved by HUD.</li> <li>b. Social Service Agencies are contacted regarding housing availability for interested clients, as part of the outreach efforts.</li> <li>c. Marketing and outreach include special efforts to attract Applicants who are least likely to apply, Applicants with incomes below the extremely low-income limit, and Applicants with incomes below the very low-income limit.</li> </ol> </li> </ol>
<b>XIV.</b>	<b>AVAILABILITY OF THE TENANT SELECTION PLAN</b>
	The Tenant Selection Plan is a written policy and is readily available to clients.