VERMONT STATE HOUSING AUTHORITY SECTION 8 PROJECT-BASED VOUCHER PROGRAM Administrative Plan

Vermont State Housing Authority (VSHA) will administer the Project-Based Voucher (PBV) program in accordance with the procedures and criteria set forth in this document, any specific requirements identified in the competitive RFP and the PBV program regulations, Part 983, which are appended to this document as Attachment A.

Part A: General CFR Reference §§983.1 – 983.10

Description of Project-Based Voucher (PBV) Program:

The PBV program is administered by a Public Housing Authority (PHA), like VSHA, who already administers the tenant-based voucher program under an annual contribution contract (ACC) with HUD. In the PBV program, the assistance is attached to the structure. The PHA enters into a HAP Contract with an Owner for units in existing housing or in newly constructed or rehabilitated housing. In the case of newly constructed or rehabilitated housing, the housing is developed under an Agreement between the Owner and the PHA. In the Agreement, the PHA agrees to execute a Housing Assistance Payments (HAP) contract after the owner completes the construction or rehabilitation of the units. During the term of the HAP contract the PHA makes housing assistance payments to the owner for units leased and occupied by eligible families.

Funding of the PBV Program:

VSHA's PBV program is funded with a portion of appropriated funding (budget authority) available under the agency's Annual Contribution Contract with HUD. This pool of funding is used to pay housing assistance for both tenant-based and project-based voucher units. There is no additional funding provided by HUD for project-based vouchers.

Discretion to operate a PBV Program:

VSHA began exercising its discretionary authority to operate a project-based program in 1991. It is the intent of the VSHA to continue to exercise this option under the October 13, 2005 final rule. VSHA shall utilize up to 20% of its program budget authority for project basing under the Section 8 Project-Based Voucher Program. VSHA shall accomplish this objective, overtime, provided adequate funds are appropriated by Congress and subject to available budget authority.

Number of Voucher units under ACC with HUD (baseline units):		
	Housing Choice Voucher:	3482
	Veterans Supportive Housing:	140
	Total Units Under Contract:	3342
Number of units <i>currently</i> set aside (2/1/2011): 597		

Area of Operation:

The VSHA works through out the state of Vermont with the exception of the City of Montpelier, which is served exclusively by the Montpelier Housing Authority. Projects located in the City of Montpelier will not be considered for project basing under this initiative.

Part B: Selection of PBV Owner Proposals CFR Reference §§ 983.51 - 983.59

VSHA will select PBV proposals by either of the following two methods:

- 1. Issuing a competitive request for PBV Proposals;
- 2. Selecting proposals that have successfully competed for housing assistance under a federal, state, or local government housing program that requires competitive selection of proposals, where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance.

Before selecting a PBV proposal, VSHA will determine that the proposal complies with all HUD requirements, including a determination that the property is eligible housing as set forth in the program regulations and complies with the cap of PBV units, meets the site selection standards, and environmental review requirements.

Public Notice of VSHA request for PBV Proposals:

Public Notice is required for PBV proposals that will be selected under a competitive request for PBV Proposals.

Public notice will be published in a variety of local newspapers of general circulation, to provide broad public notice. The public notice will specify the submission requirements and deadline.

Public Notice will also be posted on VSHA's website at www.vsha.org.

Notice of Owner Selection:

VSHA will give prompt written notice to the party that submitted a selected proposal and will also give prompt public notice of such selection. Public notice will be published in a local newspaper of general circulation to provide broad public notice.

Selection of PBV proposals previously selected through a non-PBV competition:

VSHA may entertain requests to attach PBV assistance to units previously selected by a non-PBV competition, in accordance with the requirement of 983.51(b)(2)), under the following circumstances:

- 1. Adequate PBV voucher and budget authority is projected to be available when the units are ready for occupancy;
- 2. The request meets a compelling need and is otherwise consistent with VSHA's long-term affordable housing goals;
- 3. The project is otherwise in compliance with all HUD and VSHA PBV requirements.

Submission Requirements of PBV proposals previously selected through a non-PBV competition:

The owner/project sponsor must initiate a written request for PBV assistance to VSHA accompanied by a letter from the "selection agency" that competitively selected the project for housing assistance under a federal, state or local government program. This letter, submitted on the "selection agency's" letterhead and signed by an authorized official, must include the following information:

- 1. Date of the proposal selection;
- 2. A certification that the proposal was competitively selected by the agency in full compliance with all publicly advertised selection requirements;
- 3. A statement that proposal selection did not involve any consideration that the project would receive PBV assistance.
- 4. A copy of the NOFA or other similar solicitation for affordable housing assistance that the owner/project sponsor responded to; and,
- 5. A description of the housing program for which the applicant successfully competed, noting any special deed restrictions and/or special considerations such as tenant selection preferences.

When VSHA receives the "selection agency" letter, determine if a reservation of PBV can and will be made.

Submission Requirements for PBV proposals submitted under a competitive RFP:

All proposals must be submitted on or before the published submission deadline. Proposals must be complete, and consistent with project-based voucher program regulations and statutory requirements. All information and documentation must be provided with the original submission of the proposal. Incomplete proposals or proposals that are inconsistent with program regulations and statutory requirements will not be considered for voucher assistance. Proposals submitted via email will not be accepted.

Proposals submitted in response to a VSHA competitive RFP must contain the following information:

- 1. Project Narrative: A narrative of how the proposed housing project meets the funding priorities of the RFP including the target population to be served;
- 2. Need for Housing and Compliance with HUD's Consolidated Plan: A narrative that demonstrates the *Need* for the housing being proposed and that the housing being proposed is consistent with the priorities established in State of Vermont HUD Consolidated Plan;
- 3. Project Description: A description of the housing to be provided (i.e. existing, new construction or rehabilitation) including square footage per unit, bedroom count, bathroom count, sketches of the proposed new construction or rehabilitation, unit plans, listing of amenities and services, estimated date of completion. For rehabilitation, the description must describe the property as is and also describe the proposed rehabilitation;
- 4. Proposed Contract Rents for each unit type, including list of utilities, services and equipment which will be included in the rent, and those which will not be included. For those utilities not included in the rent, an estimated monthly cost for each unit type for the first year of occupancy;
- 5. Rent Comparability: Documentation that the rent being proposed are reasonable and comparable to rents being charged for similar housing, with similar amenities in the same market area as the proposed project;
- 6. Relocation: Information concerning any necessary relocation of occupants and a certification from the owner stating that any relocation will be done in accordance with the Uniform Relocation Act;

- 7. The identity of the Owner, developer, architect, management agent, officers and principal members, shareholders, investors and other parties with substantial interest and prior HUD program participation and a disclosure of possible conflict of interest of any of the parties that would be in violation of the Agreement or the Contract, and qualifications and experience of the principal participants;
- 8. The Owner's plan for managing and maintaining the units including experience of the management agent;
- 9. Commitment of Owner and/or management agent to provide low-income housing;
- 10. If necessary, evidence of financing or lender interest;
- 11. Disclosure of other governmental assistance to be utilized within the proposed project. Subsidy layering reviews must be completed and approved by HUD for all existing and new construction/rehabilitated projects that utilize other public funds. Applicants will be required to provide VSHA with all the information/documentation required by the HUD mandated checklist found in Attachment B;
- 12. Site Selection Standards: Proposal must demonstrate that the proposed project is consistent with HUD's statutory goal of deconcentrating poverty and expanding housing and economic opportunities, as set forth in the PBV regulations, 983.57.
- 13. Environmental Review: Every PBV project is subject to HUD's environmental review requirements as set forth in the PBV regulations, 983.58. Prior to the execution of the AHAP contract (for new construction or rehabilitated properties) and a HAP contract (for existing PBV properties), the owner must present evidence that the environmental review has been performed by a HUD-designated "responsible entity" and approved by HUD, or, where applicable, is categorically excluded from review under the National Environmental Policy Act (NEPA).
- 14. Evidence of site control, and for new construction identification and description of the proposed site, site plan and the neighborhood;
- 15. Evidence of compliance with local permits and zoning requirements;
- 16. Proposed Contract Term.

Prohibition of assistance for ineligible housing:

HUD regulations prohibit the use of project-based assistance for units in the following types of housing: Shared housing; units on the grounds of a penal, reformatory, medical, mental or similar public or private institution; nursing homes; units that are owned or controlled by an educational institution designed for occupancy by students; cooperative housing; manufactured home space rental; the homeownership option and transitional housing.

Prohibition of excess public assistance:

Subsidy layering requirements: The PHA may provide PBV assistance only in accordance with HUD subsidy layering regulations (24 CFR 4.13) and other requirements. The subsidy layering review is intended to prevent excessive public assistance for the housing by combining the (layering) housing assistance payment subsidy under the PBV program with other governmental housing assistance from federal state, or local agencies, including assistance such as tax concessions or tax credits.

The PHA may not enter an Agreement or a HAP contract until HUD or an independent entity approved by HUD has conducted any required subsidy layering review and determined that the PBV assistance is in accordance with HUD subsidy layering requirements.

Owner Certification: The HAP contract must contain the owner's certification that the project has not received and will not receive (before or during the term of the HAP contract) any public assistance for acquisition, development, or operation of the housing other than assistance disclosed in the subsidy layering review in accordance with HUD requirements.

Cap on number of PBV units in each building and "excepted" units:

In general, no more than 25% of the units in any one building within the project may receive PBV assistance *unless* the units are in a single family building (defined as any building with 1-4 units) or set aside for elderly and/or disabled households or families receiving supportive services (excepted units) for the term of the HAP contract.

<u>Families receiving supportive services:</u>

Families must agree to participate in VSHA's Family Self Sufficiency program (FSS), or other locally based supportive services program that promotes the same goals and objectives as FSS – job readiness, economic independence and self-sufficiency. If a family chooses to participate in another supportive services program, other than FSS, the program must be approved by VSHA in advance of offering tenancy to families occupying "excepted" units (or housing approved for project basing under this initiative).

A family must designate which adult member of the household will be responsible (on behalf of the family) for entering into the services contract. Every participating family occupying an "excepted" unit in a PBV supportive services project must sign a lease addendum acknowledging the requirement of the family to participate in an approved supportive services program. The lease addendum will stipulate that continued occupancy in the "excepted" unit is conditioned upon participation in/and compliance with a services "Contract of Family Participation".

The "Contract of Family Participation" will establish a minimum period of time of no less than one year in which the family is expected to participate in one or more services and achieve certain goals during the term of the contract.

A household occupying an "excepted" unit cannot be required to participate in medical or disability-related services other than drug and alcohol treatment in the case of abusers as a condition of occupancy, although such services may be offered.

The family may continue in occupancy in the "excepted" unit after they have successfully completed their supportive services contractual obligations. In this instance, the units will continue to count as "excepted" units for as long as the family eligibly resides in the unit.

Monitoring family receipt of services:

VSHA will monitor the tenants' continued receipt of supportive services on an annual basis.

<u>Termination of family for failure to fulfill service obligation:</u>

Failure by the family residing in an "excepted" unit to fulfill its service obligation, without good cause, will result in termination of the tenant from the PBV program and termination of the unit from the PBV program unless it is re-occupied by another "qualifying family."

Part C: Dwelling Units

CFR Reference: §§ 983.101 - 983.103

Housing Quality Standards:

Section 24 CFR 982.401 (housing quality standards) applies to the PBV program.

<u>Lead-based paint requirements:</u>

The Lead-based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-based Paint Hazard Reduction Act of 1992, and implementing regulations at 24 CFR part 35, subparts A, B, H and R apply to the PBV program.

Housing accessibility for persons with disabilities:

The housing must comply with program accessibility requirements of section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR part 8. The percentage of accessible dwelling units must comply with the requirements of Section 504 of the Rehabilitation Act of 1973.

Design and Construction requirements:

Housing first occupied after March 13, 1991, must comply with design and construction requirements of the Fair Housing Amendments Act of 1988 and implementing regulations at 24 CFR 100.205, as applicable.

Part D: Requirements for Rehabilitated and Newly Constructed Units

CFR Reference: §§ 983.151 - 983.156

Part E: Housing Assistance Payment Contract

CFR Reference: §§ 983.201-983.209

The Housing Assistance Payments (HAP) contract must be in the form required by HUD Headquarters. A copy of the HAP contract is provided as Attachment C to this document.

The purpose of the HAP contract is to provide housing assistance for eligible families. VSHA will make housing assistance payments to the owner in accordance with the HAP contract. Housing assistance is paid for contract units leased and occupied by eligible families during the HAP contract term.

HAP Contract Information:

The HAP contract must specify:

- 1. The total number of contract units by number of bedrooms;
- 2. Information to identify where the site and buildings where contract units are located;
- 3. Information to identify the specific contract units in each building;
- 4. Services, maintenance and equipment to be supplied by the owner;
- 5. Utilities to be provided by the owner to the contract units;
- 6. Features provided to comply with program accessibility requirements;
- 7. The HAP contract term;
- 8. The number of units in each building that will exceed the 25 percent per building cap, which will be set-aside for occupancy by qualifying families (elderly or disabled families and families receiving supportive services); and

9. The initial rent to owner (for the first 12 months of the HAP contract term).

When the HAP contract is executed:

VSHA will not enter into a HAP contract for any contract unit until the unit complies with HQS.

Existing housing:

The HAP contract will be executed after selection of the owner proposal and PHA inspection of the housing.

Newly constructed or rehabilitated housing:

In the case of newly constructed or rehabilitated housing, the HAP contract will be executed *after* the PHA has inspected the completed units and has determined that the contract units have been completed in accordance with the Agreement and the owner has furnished all required evidence of completion (see §§983.155 and 983.156).

Term of the HAP contract:

VSHA will enter into a contract with an owner for an initial term of up to ten years for each contract unit. The length of the term of the HAP contract for any contract unit may not be less than one year or more than ten years.

Extension of the HAP contract:

Within one year before expiration, the PHA may agree to extend the term of the HAP contract for ad additional term of up to five years if the PHA determines an extension is appropriate to continue providing affordable housing for low-income families. Subsequent extensions are subject to the same limitations. Any extension of the term must be on the form and subject to the conditions prescribed by HUD at the time of the extension.

<u>Termination of the HAP contract - insufficient funding:</u>

The PHA's contractual commitment is subject to the availability of sufficient appropriated funding (budget authority) as determined by HUD or VSHA.

If it is determined that there may not be sufficient funding to continue housing assistance payments for all contract units for the full term of the HAP contract, the PHA has the right to terminate the HAP contract by notice to the owner for all or any of the contract units.

Termination of the HAP contact by the owner - reduction below initial rent:

The owner may terminate the HAP contract, upon notice to the PHA, if the amount of the rent to owner for any contract unit, as adjusted in accordance with §983.302, is reduced below the amount of the initial rent to owner at the beginning of the HAP contract. In this case, the assisted families residing in the contract units will be offered tenant-based voucher assistance.

HAP contract amendments (to add or substitute contract units):

VSHA will permit the owner to substitute a different unit with the same number of bedrooms in the same project for a previously covered contract unit provided the owner has otherwise acceptably performed all requirements under the HAP contract and the substitution does not violate the 25% cap.

Amendment to add contract units:

VSHA may permit additional PBV units to be added to the PBV HAP contract provided it has adequate The total number of units in the building that will receive PBV assistance, or other project-based assistance, will not exceed 25% of the number of dwelling units (assisted or unassisted) in the building; the HAP can be amended during the three-year period immediately following the execution date of the HAP contract; the owner has otherwise acceptably performed all requirements under the HAP contract; and the addition of unit is consistent with VSHA priorities and requirements

Part F: Occupancy

CFR references: §\$983.251-983.261

How participants are selected:

Protection of in-place families: An "in-place family" is an eligible family residing in a proposed contract unit on the proposal selection date.

In order to minimize displacement of in-place families, if a unit to be placed under contract that is either an existing unit or one requiring rehabilitation is occupied by an eligible family on the proposal selection date, the in-place family must be placed on the PHA's waiting list (if the family is not already on the list) and, once its continued eligibility is determined, given an absolute selection preference and referred to the project owner for an appropriately sized PBV unit in the project.

The PHA may deny assistance if the family owes the housing authority money or vacated a VSHA administered program in violation of program requirements. Admission of such families is not subject to income-targeting under 24 CFR 982.201(b)(2)(i), and such families must be referred to the owner from the PHA's waiting list. A PHA shall give such families priority for admission to the PBV program. This protection does not apply to families that are not eligible to participate in the program on the proposal selection date.

Income Targeting:

Not less than 75 percent of the families admitted to a PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the PHA waiting list shall be extremely low-income families. The income-targeting requirements at 24 CFR 982.201(b)(2) apply to the total of admissions to the PHA's project-based voucher program and tenant-based voucher program during the PHA fiscal year from the PHA waiting list for such programs.

Units with accessibility features:

In selecting families to occupy PBV units with special accessibility features for persons with disabilities, the PHA must first refer families who require such accessibility features to the owner (see 24 CFR 8.26 and 100.202).

Offer of PBV assistance:

If a family refuses the PHA's offer of PBV assistance, such refusal does not affect the family's position on the PHA waiting list for tenant-based assistance.

If a PBV owner rejects a family for admission to the owner's PBV units, such rejection by the owner does not affect the family's position on the PHA waiting list for tenant-based assistance.

The Application Process:

Interested individuals should submit a Section 8 application to the Housing Authority. A form outlining the various properties available, including type and location, will be sent with the application. Applicants should complete this form and indicate whether they have an interest in being considered for tenancy at a particular property. VSHA will place these individuals on a special *property-based* waiting list. All Section 8 candidates will be given the opportunity of being placed on property-based waiting lists. VSHA utilizes 'housing preferences' when ranking applicants on its' waiting lists. Applicants deemed eligible for a housing preference will be placed on the property-based waiting lists ahead of other applicants.

Property-based waiting lists will be provided to the property owner/agent (POA) on a regular basis (at least twice a month). The POA will be expected to follow the waiting list provided and *consider* for housing all applicants that apply to reside at the property.

The POA is responsible for determining applicant eligibility using their selection criteria. Applicants found not eligible, or who are no longer interested, will be removed from the waiting list. Applicants who are removed from the waiting list will be sent a letter notifying them that their application has been removed.

If an applicant is offered a unit but is unable to accept the offer of the unit at the time the unit becomes available, but continues to be interested in remaining on the waiting list, the Applicant will be placed at the bottom of the property-based waiting list, with a new application date effective the date the request is made to VSHA.

The POA will notify the VSHA Intake Staff as applicants are removed from the property-based waiting list (and the reason for the removal). The POA may be expected to defend tenant selection at any point in time.

If there are no applicants on VSHA's waiting list, the POA must advertise and market the units to families who are otherwise eligible for Section 8.

In an effort to minimize the vacancy period, the POA will notify VSHA *immediately* upon learning of a vacancy or potential vacancy.

Internal unit transfers <u>are not</u> are not considered waiting list admissions and therefore <u>are not</u> subject to the selection procedures outlined above.

Tenant Eligibility:

In order for applicants to receive assistance under the Section 8 program, they must meet all necessary eligibility requirements. In order to step up the process, VSHA is requesting that owners obtain

¹ Property-based waiting lists are specific to each PBV property, i.e. one waiting list for each property.

² VSHA's Admission Preferences are defined in VSHA's Section 8 Admissions and Continued Occupancy Policies, amended August 1, 2006. The Admission Preferences include: Victims of Domestic Violence who have no options for safe housing; families living in substandard housing which is subject to condemnation or that has significant life safety code violations; Family that includes a child with elevated blood-lead levels of at least 15 ug/dl; Educational/Training preference; and a Homeownership preference.

completed forms and third party verifications from prospective tenants. These include, but are not limited to, social security card verifications, HUD releases, citizenship verifications, and completed personal declaration forms. Also required are third party verifications of all income sources (including benefit income such as ANFC, pensions, SS & SSI) and assets (including checking & savings accounts, retirement accounts, investments, real estate) including those disposed of in the last two years, as well as a breakdown of current medical or child care expenses.

VSHA will provide verification forms to the POA upon their request. VSHA will allow the POA to use their own verification forms, if requested by the POA, provided the forms are acceptable to VSHA. Should an owner not be able to obtain these forms, applications will be sent to VSHA's intake office, which will process them in a timely manner. However, because the timely processing of applications relies on the cooperation of all parties involved, VSHA does not have complete control over the process. As a result, the total eligibility process may take from two to six weeks.

Time frames:

Once an owner or agent has provided VSHA with the completed verifications, VSHA should be able to approve eligibility within five (5) working days. However, as stated above, if completed forms are not forwarded to VSHA, the verification process will take longer since several steps in the process are outside VSHA's control.

Lease and Housing Assistance Payments Contract:

VSHA understands that various rent structures are dictated by funding agreements. However, no rent may be higher than the highest tax credit rent, and the rent must be reasonable as determined by VSHA policy and procedures. The owner/agent is responsible for meeting the requirements of their funding sources and these requirements do not bear on the project-based voucher application or HAP contract.

The designation of project-based voucher apartments must be in compliance with the HAP contract in regard to the bedroom size, rent amount, and the specific apartment or building identified in the project-based application and HAP contract. Owners may use their own leases, but a HUD tenancy addendum must be provided to the assisted family and attached to the lease. The HAP contract shall be negotiated and completed by VSHA staff. A sample HAP contract is attached.

<u>Inspections:</u>

All units are required to pass the HUD/VSHA Housing Quality Standard (HQS) inspection. Before entering into a HAP contract, VSHA must inspect and approve all units.

Annual HQS inspections will be completed on a sample of units. HUD requirements will determine the sample size.

Vacancy claims and the submission of claim forms:

VSHA will pay vacancy claims up to a maximum of sixty (60) days, beginning on the day the family vacated. Payments are not to exceed the rent paid (HAP) to the owner as provided by the HAP contract, and will only be made if the owner has taken every reasonable action to minimize the likelihood of vacancies. See attached claim form (attachment F).

Claims shall be submitted to VSHA <u>after</u> the 60 day vacancy period but not later than 90 days after the tenant vacates the unit.

Claims must be accompanied by supporting documentation, or they WILL NOT, will be considered for payment.

Claims that fail to meet the criteria setforth in this policy, WILL NOT be eligible for vacancy loss payments.

Rent Adjustments and Reexams:

Rent Adjustments. Requests for rent adjustments need to be requested one hundred and twenty (120) days prior to the anniversary date of the HAP contract.

The owner/agent must certify that proportional and similar increases will be applied to all units in the project. The gross rent paid to the owner may not exceed the payment standard established by VSHA, or in some instances the tax credit rent, for the area where the property is located. Rents charged must be reasonable in comparison to other rents charged for similar, unassisted units in the local market. Rent reasonableness will be determined by VSHA staff, in accordance with VSHA's Rent Comparability Policies.

Reexams. All tenants will have a reexam scheduled one hundred and twenty (120) days prior to the HAP anniversary date, and will be so informed at lease-up. Reexam forms will be mailed to tenants, who will complete and return them to VSHA. Tenant assistance in completing the reexam forms is available upon request.

Moves:

Tenants leased in an apartment are expected to remain in that apartment. Any move within the project must follow the POA's Unit Transfer Policy, all Housing Choice Voucher procedures, including a thirty (30) day notice, a mutual rescission of the lease or landlord certificate, an interim application, and new lease-up.

A tenant's right to continued assistance:

At the end of the first year of the lease, any tenant requesting to move from his or her project-based assisted unit will be placed at the top of the Section 8 waiting list and issued a tenant-based portable voucher, provided the tenant is in good standing (in compliance with the terms and conditions of the lease) and current in rent. The first year of tenancy is based on the calendar date of the lease-up and is not related to the anniversary date of the HAP contract or reexam date.

Any Housing Choice Vouchers issued for continued assistance must be approved by VSHA based <u>on</u> the availability of funds and compliance with VSHA stated procedures.

Attachment A: PBV Regulations

Attachment B: HUD-mandated subsidy layering review checklist

Attachment C: Housing Assistance Payments contract

Attachment D: Tenant eligibility checklist

Attachment E: Owner/Agent preoccupancy meeting checklist

Attachment F: Vacancy Claim Form

Attachment D

Section 8 Project-Based Assistance Tenant Eligibility Checklist

In order for VSHA to approve applicant files for project-based assistance, each applicant must provide VSHA with the following information.

- 1. A completed VSHA Section 8 application. Updated applications (completed and signed within the last sixty (60) days) must be included with every prospective tenant file, regardless of when the individual originally applied to VSHA.
- 2. Citizenship verification for each family member.
- 3. Social Security card number verification for each family member.
- 4. A criminal record release for each adult family member.*
- 5. Third-party verification of all income sources.
- 6. Third-party verification of all assets, including checking accounts and assets disposed of in the last two years (for example, real estate).
- 7. Third-party verification of all deductions, including ongoing medical expenses, child-care expenses.

If an applicant indicates on the application that s/he has received previous rental assistance, additional verification may need to be conducted by VSHA in order to determine eligibility.

*If a criminal record indicates any current or previous drug-related criminal activity, or if the individual is subject to a lifetime registration under the state sex offender laws, the applicant would be ineligible for assistance through VSHA.

Attachment E

Section 8 Project-Based Assistance Owner/Agent Pre-Occupancy Meeting

Checklist

- 1. Application Process, including how to apply and placement on special property-based waiting list(s).
- 2. Notice of unit availability.
- 3. Determining and Processing Eligibility, including requirements and timetables.
- 4. Lease Addendum and HAP Contract, including a sample addendum.
- 5. Unit Inspections.
- 6. Submission of Special Claims, including sample claim forms with relevant explanations.
- 7. Rent Adjustments.
- 8. Questions.