RULES OF WEBINAR

- Feel free to ask questions as we go, or wait until the “Questions?” slides.

- Never implement changes to policies or procedures without running the changes through your corporate ladder.

- Your PBCA/Tax Credit Monitoring Agency may have specific requirements not included here. Be sure to incorporate those requirements.

DISCLAIMER

- Always consult your attorney to ensure your practices comply with local/state/federal/Fair Housing Law, etc.

- I am not an attorney. I am not giving you a legal opinion. I will not stand next to you in court if you get sued. I will not post your bail.
TODAY’S DISCUSSION

- Working with Applicants
- Applications
- Gathering Data
- Reviewing the Data
- Verifying Data
- Zero Income Renters
- Hardship Exemptions
- Applicant Education

WORKING WITH APPLICANTS

- Be Professional
- On Time
- Dressed Appropriately
- Treat All Applicants Fairly
- Personal Bias or Stereotypes

WORKING WITH APPLICANTS

- Be Professional
- Verbal Communication
- Rapport-Building
- Listening
- Analytical
- Knowledge of Program Rules
- Greeting – Who/What
APPLICATIONS

- BE PREPARED
- USE A CHECKLIST
- HAVE APPLICATION AND CONSENT FORMS READY
- REVIEW ANY PREVIOUSLY KNOWN INFORMATION

Using a checklist helps ensure all applicants are given the same information. This helps prevent a Fair Housing violation.

APPLICATIONS

- CONTENTS OF APPLICATION
  - HOUSEHOLD CHARACTERISTICS
  - CONTACT INFORMATION
  - IDENTIFY PREFERENCES
  - INCOME/ASSET/ALLOWANCES
  - CITIZENSHIP
  - MARKETING INFORMATION
  - SCREENING INFORMATION

APPLICATIONS

- CONTENTS OF APPLICATION
  - LIFETIME REGISTERED SEX OFFENDERS
  - LISTING OF ALL STATES
  - SOCIAL SECURITY NUMBER
  - FORM HUD-92006
GATHERING DATA

- Transition to Completing the Application
- Explain the Purpose of the Application
- Explain EIV (if applicable)

GATHERING DATA

- Provide Overview of the Program and Tenant Selection Process
- "Before beginning the interview Mr./Mrs.____, there are certain things I am required to explain to you about the interview process. I am going to use this checklist to review them so that I don’t leave out anything that is important for you."

Using a checklist helps ensure all applicants are given the same information. This helps prevent a Fair Housing violation.

GATHERING DATA

- Explain the Information that is to be Gathered
- "As a part of completing your application I will be asking you to answer questions and to provide information about your situation. These questions will pertain not only to you but to all of your family members who will be living with you."
- "Many of these questions are personal and confidential in nature. For example, I will be asking you the SSNs of all family members and questions about various types of income (money) received by you and the other members of your family. I will be asking questions about assets such as property, bank accounts, investments, and life insurance."
- "It is important for you to know that all applicants are required to provide the same type of information and answer the same type of questions."
**GATHERING DATA**

**EXPLAIN HOW THE INFORMATION WILL BE USED AND MAINTAINED**

- It is important for you to understand that any information or documents you provide will only be used for the purposes of determining your eligibility to lease a unit and to determine the amount of rent you will pay. The information will not be shared with anyone without your written consent. We will place your application in an individual file, and it will be kept in a locked and secure location.

If the applicant trusts you, they will be more likely to disclose private information.

**GATHERING DATA**

**EXPLAIN THE VERIFICATION PROCESS**

- When you complete your application, we are required to verify the information you have provided, and you will be required to sign authorization forms so that we are able to do that.
- Here are some examples of how we verify information: if any family member works, we will request 6-12 of the most current consecutive pay stubs and compare them with data in the Enterprise Income Verification System (EIV). EIV identifies sources of income that your household may be receiving, such as employment, social security, or unemployment benefits.
- We will request current bank statements to verify assets. We may also request tax returns or other documents needed to verify all relevant information. Finally, we will run a credit bureau inquiry.

**GATHERING DATA**

**EXPLAIN THE IMPORTANCE OF COMPLETE AND ACCURATE INFORMATION**

- Because of the verification requirements, I'm sure you can see why it is so important that the information you provide today is complete and accurate. As we go through the application, please let me know if you are not sure of something asked of you. I'll be happy to explain it.
GATHERING DATA

• EXPLAIN THE CONSEQUENCES OF INCOMPLETE AND INACCURATE INFORMATION

• "THERE IS ANOTHER IMPORTANT POINT THAT WE ARE REQUIRED TO EXPLAIN. IT HAS TO DO WITH THE PENALTIES FOR MAKING FALSE OR INCOMPLETE STATEMENTS OR PROVIDING FALSE OR INCOMPLETE DOCUMENTS WITH YOUR APPLICATION. I’M SURE THAT THIS DOES NOT APPLY TO YOU, BUT OCCASIONALLY SOME APPLICANTS HAVE NOT PROVIDED CORRECT INFORMATION.

• "WHEN YOU SIGN THE REQUIRED FORMS YOU ARE CERTIFYING THAT YOU HAVE GIVEN COMPLETE AND ACCURATE ANSWERS. THERE ARE BOTH CRIMINAL AND CIVIL PENALTIES FOR MAKING FALSE STATEMENTS ON A HOUSING APPLICATION. IN ADDITION TO THESE PENALTIES, IF ANY APPLICANT PROVIDES FALSE OR INCOMPLETE INFORMATION, WE WOULD HAVE NO CHOICE BUT TO DENY THE APPLICATION."

Make sure applicants understand the penalties for providing incomplete or inaccurate information. Money/Jail/Denial/Eviction

GATHERING DATA

• ENSURE EVERYTHING HAS BEEN UNDERSTOOD

• “NO, BEFORE WE BEGIN, DO YOU HAVE ANY QUESTIONS OF ME? IS THERE ANYTHING THAT YOU ARE NOT SURE OF OR HAVE QUESTIONS ABOUT?”

• OR–

• “IS THERE ANYTHING ELSE YOU NEED TO KNOW ABOUT HOW WE ARE GOING TO HANDLE THE INTERVIEW, HOW WE WILL VERIFY OR USE THE INFORMATION YOUR PROVIDING?”

GATHERING DATA

• APPLICATION TIPS

• APPLICATION SHOULD CONTAIN DETAILED QUESTIONS.

• DO’S

• "DOES ANY HOUSEHOLD MEMBER HAVE A JOB?"

• “WHO IS WORKING?”

• "DOES ANY HOUSEHOLD MEMBER RECEIVE UNEMPLOYMENT?"

• "WHO?"

• "DOES ANY HOUSEHOLD MEMBER HAVE A CHECKING ACCOUNT?"

• "WHO? WHERE ARE THE ACCOUNTS HELD?"

• "DO YOU ANTICIPATE ANY CHANGES IN THE NUMBER OF HOUSEHOLD MEMBERS WHO WILL RESIDE IN THE UNIT?"


**GATHERING DATA**

- **APPLICATION TIPS**
  - Application should contain detailed questions.
  - Questions should not lead applicants.
- **DONT'S**
  - "List your sources of income."
  - "List which assets you have."
  - "Are you pregnant?"
  - "You don't have any assets do you?"
  - "You don't have life insurance policy do you?"

**REVIEWING DATA**

- Ensure all questions have been answered
- If "N/A" has been entered, ask the applicant to enter a "Yes" or "No"
- Don't assume anything
- Avoid negative body language or facial expressions

- **SURE ALL RESPONSES MAKE SENSE**
  - Social security - No assets
  - Reported income - common expenses
  - Compare last year's sum to the questionnaire
REVIEWING DATA

• ASK CLARIFYING QUESTIONS
  • "MR. JONES, I SEE YOU REPORTED YOU RECEIVE SOCIAL SECURITY BENEFITS, BUT YOU DO NOT HAVE AN ASSET LISTED. GENERALLY, SOCIAL SECURITY NO LONGER CUTS CHECKS. IN WHICH MANNER DO YOU RECEIVE YOUR BENEFITS?"
  • "MS. SMITH, THERE IS A DIFFERENCE OF $X BETWEEN YOUR INCOME AND THE REGULAR EXPENDITURES YOU HAVE REPORTED. CAN YOU EXPLAIN THAT TO ME?"
  • "MR. GREEN, HELP ME UNDERSTAND HOW..."

GATHERING DATA

• PROVIDE HUD FACTS SHEETS
• INFORM TENANT DETERMINATION OF ELIGIBILITY WILL OCCUR AFTER ALL INFORMATION IS VERIFIED.

VERIFYING DATA

• PROVIDE LIST OF ITEMS APPLICANT IS TO BRING
• SET DEADLINES
• VERIFICATIONS/CONSENTS
VERIFYING DATA

- Review documents as they come in
- Prepare to resolve discrepancies
- Do not assume applicant lied
- Obtain additional documents, if needed
- Document basis for decision

ZERO INCOME RENTERS

- Different types of zero renters
  - Due to income exclusions
  - Due to allowances
  - Due to adverse circumstances

- Due to adverse circumstances
- Extended periods of time
- Drive the Lexus/BMW/Lincoln
  - 80" flat screen TV
  - Smart phone
ZERO INCOME RENTERS

• CURRENT EXPENSE ANALYSIS

<table>
<thead>
<tr>
<th>Expense Item</th>
<th>Amount</th>
<th>Current</th>
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<tbody>
<tr>
<td>Auto</td>
<td>$125</td>
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ZERO INCOME RENTERS

• ZERO INCOME CERTIFICATION

Do you or any household members have any of the following expenses?

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</tr>
</thead>
<tbody>
<tr>
<td>Internet/cable</td>
<td></td>
<td>Y</td>
<td>$60.00</td>
</tr>
<tr>
<td>Food</td>
<td></td>
<td>Y</td>
<td>$240.00</td>
</tr>
<tr>
<td>Telephone</td>
<td></td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>Clothes or shoes</td>
<td></td>
<td>Y</td>
<td>$200.00</td>
</tr>
<tr>
<td>Cleaning supplies (dishes or laundry soap)</td>
<td></td>
<td>Y</td>
<td>$60.00</td>
</tr>
<tr>
<td>Personal hygiene items (deodorant, shampoo, shaving cream)</td>
<td></td>
<td>Y</td>
<td>$20.00</td>
</tr>
</tbody>
</table>

Please describe how you are paying for these expenses.

- Internet/cable: Y gives me money
- Food: Food stamps
- Cleaning supplies: Shelter provides
- Personal hygiene items: Dad gives me money
ZERO INCOME RENTERS

• ZERO INCOME CERTIFICATION
• HUD RECOMMENDS 90 DAYS
• RENT PAYMENT
• SKIPS
• COMPARE ZERO INCOME CERT TO QUESTIONNAIRE/CREDIT REPORT/PRIOR 50059-6TC

HARDSHIP EXEMPTIONS

• ONLY APPLIES TO FAMILIES IN SECTION 8

HARDSHIP EXEMPTIONS

• OWNERS MUST WAIVE THE MINIMUM RENT FOR ANY FAMILY UNABLE TO PAY DUE TO A LONG-TERM FINANCIAL HARDSHIP, INCLUDING THE FOLLOWING
  • FAMILY LOST FEDERAL, STATE, OR LOCAL GOV’T ASSISTANCE OR WAITING FOR A DETERMINATION OF ELIGIBILITY
  • FAMILY WOULD BE EVICTED IF THE MINIMUM RENT REQUIREMENT WAS IMPOSED
  • FAMILY INCOME HAS DECREASED DUE TO A CHANGE IN CIRCUMSTANCES, INCLUDING BUT NOT LIMITED TO LOSS OF EMPLOYMENT
  • A DEATH IN THE FAMILY HAS OCCURRED
  • OTHER

HUD Handbook 4350.3, page 5-69, paragraph 5-26 D. 3
**HARDSHIP EXEMPTIONS**

- **WHEN HARDSHIP IS GRANTED**
  - BEGINNING OF THE MONTH AFTER THE REQUEST
  - TTP BECOMES THE HIGHER OF
    - 30% ADJUSTED MONTHLY INCOME
    - 10% GROSS MONTHLY INCOME
  - TTP WILL NOT BE ZERO ($0) UNLESS BOTH THE ABOVE RESULT IN ZERO ($0)

*HUD Handbook 4350.3, page 5-69, paragraph 5-26.D.3*

**HARDSHIP EXEMPTIONS**

- **REQUEST DOCUMENTS TO SUPPORT NEED**
  - LONG-TERM VS. SHORT-TERM

*HUD Handbook 4350.3, page 5-69, paragraph 5-26.D.3*

**HARDSHIP EXEMPTIONS**

- **SHORT-TERM**
  - 90-DAYS OR LESS
  - TENANT MUST REPAY
  - DO NOT EVICT

*HUD Handbook 4350.3, page 5-69, paragraph 5-26.D.3*
HARDSHIP EXEMPTIONS

- LONG-TERM
- RECERTIFY EVERY 90-DAYS
- MUST PROCESS IR

HUD Handbook 4350.3, page 5-69, paragraph 5-26.3

HARDSHIP EXEMPTIONS

- DON'T GIVE THEM OUT LIKE CANDY

This is a Tim Herrman-ism

THANK YOU!

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