

Resident Selection Plan & Occupancy Standards

(Effective 08/01/2011, Update 08/07/2019)

The mission of Kavod Senior Living (Kavod) is to provide affordable housing and services to enhance the personal dignity of older individuals. Guided by Jewish tradition, the community is designed to enrich the residents' physical, emotional and spiritual quality of life, to help them age in place and to maintain the highest possible level of independence. Kavod serves people of all religions.

Kavod consists of Kavod Senior Life and Kavod Senior Housing & Services, two non-profit corporations governed by a Board of Directors representing the Denver Community.

Kavod selects residents in compliance with applicable laws and regulations including fair housing and equal opportunity requirements. The Resident Selection Plan is developed to ensure reasonable and objective standards for determining eligibility of applicants, consistent with the purpose and mission of the company.

I. HUD Program Requirements for Eligibility

Kavod is regulated and subsidized by the Department of Housing and Urban Development (HUD). Applicants and tenants must meet the following requirements to be eligible for occupancy and housing assistance:

1. Applicants for subsidized apartments must have finances that do not exceed local income eligibility guidelines established by HUD. HUD determines eligibility by evaluating an applicant's income as derived from ALL SOURCES. Documentation of all income information is required by HUD and must be provided by applicants. Income eligibility amounts for subsidized units are determined by current HUD schedules. Some market rate non-subsidized units are available for applicants at higher income levels.
2. Applicants must disclose social security numbers for all household members and provide proof of the numbers reported, unless individual is age 62 or older as of January 31, 2010, whose initial determination of eligibility was begun prior to January 31, 2010, or existing tenant as of January 31, 2010, who have previously disclosed their social security number and HUD has determined their social security number to be valid, and individuals who have not claimed eligible immigration status.



3. All adults in each applicant household must sign an Authorization for Release of Information prior to receiving assistance and annually thereafter. (HUD Form 9887/9887A)
4. The unit for which the household is applying for assistance must be the household's only residence.
5. An applicant must agree to pay the rent required by the program under which the applicant will receive assistance.
6. Eligibility of Students for Section 8 assistance: Kavod must determine a student's eligibility for assistance at move-in, annual recertification, initial certification, and at the time of an interim recertification if one of the household composition changes reported is that a household member has enrolled as a student.

Section 8 assistance shall not be provided to any individual who:

- a. Is enrolled as either a part-time or full-time student at an institution of higher education for the purpose of obtaining a degree, certificate, or other program leading to a recognized educational credential;
- b. Is under the age of 24;
- c. Is not married;
- d. Is not a veteran of the United States Military;
- e. Does not have a dependent child;
- f. Is not a person with disabilities, as such term is defined in 3(b) (3) (E) of the United States Housing Act of 1937 (42 U.S.C. 1437a (b) (3) (E)) and was not receiving section 8 assistance as of November 30, 2005);
- g. Is not living with his/her parents who are receiving Section 8 assistance; and
- h. Is not individually eligible to receive Section 8 assistance and has parents (the parents individually or jointly) who are not income eligible to receive Section 8 assistance.

7. Only U.S. citizens and eligible non-citizens may receive assistance under the programs available at Kavod (Section 202/8, Section 236, and 221d3/Section 8). All adults in each applicant household must complete a Citizenship Declaration and provide verifiable documentation of their status. Non-citizen students and their non-citizen families may not receive assistance.

8. All information reported by the applicant is subject to verification.

II. Kavod Project Requirements for Eligibility

1. Kavod is an Elderly and Disabled Household project. The Head of Household must

be at least 62 years of age or benefit from the features of accessible units designed specifically for mobility-impaired persons.

2. Income limits vary by household size. Kavod will provide applicants a copy of the income limits for the property upon request. In addition, applicants can review the income limits by accessing the following web site: <http://huduser.org/datasets/il.html>. As required by HUD, Kavod incorporates the most recently published income limits when determining eligibility. Income limits are updated by HUD annually. Qualified applicant households must meet the following income limit requirements:

- for 11 South Adams Street (West building) - low, very low, and extremely low;
- for 22 South Adams Street (East building) - low, very low, and extremely low;
- for 44 South Adams Street (South building) - very low, and extremely low.

Income Targeting Preference: Kavod must comply with HUD's Income Targeting Requirements. Kavod must lease not less than forty percent (40%) of the dwelling units that become available for occupancy in any project fiscal year to extremely low-income families. If Management determined that the required forty percent (40%) threshold may not be met, Management may "skip over" higher income applicants in order to reach extremely low income targeting. This will be accomplished by alternating between the first extremely low-income applicant on the wait list and the applicant at the top of the wait list.

3. Kavod has a statutory preference for applicants displaced due to government action or a presidential declared disaster such as Hurricane Sandy. Existing Kavod residents requesting transfers are also given preference on the wait list.

4. Kavod offers studios and one bedroom units. The maximum occupancy in a studio is one person. The maximum occupancy in a one bedroom is two people. Kavod shall not provide bedroom space for persons who are not members of the household, such as adult children on active military duty, permanently institutionalized family members or visitors. Kavod will count all full time members of the household and live-in attendants. Household composition will be considered when applying this rule.

5. Applicants must be able to care for themselves or personally arrange for necessary assistance and must be able and willing to comply with the lease and house rules. Mobility-impaired persons may meet the requirements of the lease with the self-provided assistance of others, including an assistance animal, live-in aide, or with services provided by someone who does not live in the unit.

6. Applicants must have verifiable rental/owner history, credit history, and non-criminal background. Mobility-impaired persons must have verifiable medical records of their disability. Screening is used to help ensure that applicants admitted to the

property meet the requirements for eligibility and will abide by the terms of the lease, pay rent on time, take care of the property, and unit, and allow all residents to peacefully enjoy their homes. Management will decline applicants for poor credit/rental history; however lack of applicable history is not grounds for rejection.

7. A personal interview conducted by Kavod Resident Care department is required prior to acceptance for occupancy

8. Kavod has a meal program which is part of the lease agreement. It consists of six evening meals a week (Sunday through Friday). The monthly cost of the meal program approved by HUD is subject to change annually.

III. Application Process

The following guidelines will assist you in understanding the procedure that will be followed to process your completed application:

1. Please mail or deliver the completed application materials to:
Kavod Senior Life
Attn: Leasing Coordinator
22 South Adams Street
Denver, CO 80209
2. The application is received by Kavod's Leasing Coordinator and reviewed for completion of all required information.
3. If any item is incomplete, the application is returned with a request for additional information.
4. If complete, the application is stamped with the date and time received. The applicant is entered on the bottom of the Wait List. If the applicant is requesting residence in our Assisted Living, their application will be forwarded to the Director of Assisted Living, who maintains a separate Wait List specifically for that program.
5. The application is then reviewed to determine if applicant(s) meets HUD requirements for age, income, and citizenship/alien status. Kavod will decline applicant(s) if the applicant is ineligible for occupancy for our project type as indicated in Section II, Item 1, is unable to disclose and document social security numbers of all household applicable members, does not sign and submit verification consent forms or the Authorization for Release of Information, or has household characteristics that are not appropriate for the specific type of units within our property. All rejection notices will be completed in writing.

6. As a part of initial screening all applicants will be subject to EIV (Enterprise Income Verification) System Existing Tenant Search in order to verify HUD compliance criteria of single residence. Income and Discrepancy Report (if applicable) will be conducted 90 days after the move in to insure compliance with HUD Regulations.

7. Credit check, criminal background check, landlord checks, and disability verification are conducted at receipt of application and/or within 120 days of move in.

The following conditions would warrant an automatic decline for occupancy:

- a. Landlord check revealed an eviction within the last five (5) years.
- b. Any delinquent or charge off debt over \$100 due to other apartment communities.
- c. Credit history for the last three (3) years will be reviewed. Applicants whose credit histories are unacceptable will be declined and removed from the wait list. The following will be considered unacceptable credit history:
 - i. Amounts placed for collection totaling \$3,000 or more.
 - ii. Amounts placed into charge-offs accounts totaling \$3,000 or more.
 - iii. A derogatory credit item(s) within the past three (3) years such as repossessions, foreclosures, judgments, liens and any open bankruptcy.
- d. The lack of credit history or past due payments or derogatory credit relating to medical expense will not be considered as grounds for declining an applicant.
- e. Criminal background check indicates a felony conviction within the last five (5) years or any drug or sexual related charges during lifetime.
- f. Criminal background check indicates incarceration release date within the last two (2) years for a felony offense from the date of application.
- g. Disability verification indicates the applicant(s) cannot benefit from the features of an accessible unit designed specifically for mobility-impaired persons and the household does not otherwise qualify per Section II 1.

8. Kavod uses these additional guidelines to decline for occupancy:

- a. Applicant(s) cannot have any non-compliance with previous rental agreements, such as violating the lease and/or house rules, altering property, destruction of property, non-payment of rent, failure to cooperate with applicable re-certification procedures, termination of assistance for fraud, unauthorized guests and/or pets, living or housekeeping habits which may adversely affect the health, safety, or welfare of other tenants or the applicant him/herself. Rental history screening will also include verification

for those who were homeowners or lived with parents, guardians, or other relatives. Applicant cannot have been evicted within the last five (5) years for any reason.

- b. Kavod prohibits admission:
 - i. if any household member is currently engaged in illegal drug use;
 - ii. if any household member has been evicted for drug-related criminal activity;
 - iii. if Kavod determines that there is reasonable cause to believe that a household member's illegal use or pattern of illegal use of drug or pattern of abuse of alcohol may interfere with the health, safety, or right of peaceful enjoyment of the premises by other residents. Pattern of alcohol abuse is defined as three (3) or more offenses within the last five (5) years;
 - iv. if any member of the household has been convicted within past five (5) years for illegal drug use, manufacture or distribution of a controlled illegal substance;
- c. Applicant(s) cannot have any record of fraud in connection with any housing program, or any willful misrepresentation in this application procedure.
- d. Kavod uses a resident screening provider to conduct our credit checks. Applicant has the rights to review their credit report. It is the applicant's responsibility to contact the credit reporting agency to resolve any items that have been incorrectly reported.
- e. Kavod reserves the rights to conduct criminal background checks at any time during application process or residency if in receipt of credible and verifiable information that would lead to ineligibility.
- f. Applicant(s) will be notified in writing of the decision if they are denied admission. The rejection notice will include specifically stated reason(s) for the rejection and applicant's right to appeal and to respond to Kavod in writing to request a meeting within fourteen (14) days to dispute the rejection.

9. It is the policy of Kavod to administer its wait list as required by HUD handbooks and regulations. Kavod will update the wait list every six months by contacting all applicants in writing or by the phone.

If an applicant household composition changes and the result is a need for a different sized unit, Kavod will place the applicant on the wait list for the appropriate sized unit. The applicant will keep their original application date and be placed on the Wait List for a different sized unit based on their original application date.

The applicant must notify Kavod in writing or by phone of any change of address, phone, or other information relevant to the application. Written correspondence

should be sent to: Kavod Senior Life
Attn: Leasing Coordinator
22 South Adams Street
Denver, CO 80209

10. Kavod will not remove an applicant's name from the wait list unless:
- The applicant requests that the name be removed.
 - Kavod made a reasonable effort, in writing or/and by phone, to contact the applicant to determine if there was continued interest in housing but was unsuccessful in making contact.
 - Mail sent to the applicant's address is returned as undeliverable.
 - Kavod will notify the applicant, in writing, of its intention to remove the applicant's name, because the applicant no longer qualifies for assisted housing.
 - The unit that is needed – using household size as the basis – has changed, and no appropriate size unit exists in the property.
 - Applicant refused one (1) offer of unit for other than medically related reason.

If an applicant is removed from the list, and subsequently Kavod determines that an error was made in removing the applicant, the applicant will be reinstated at the original place on the wait list. If an applicant is in the hospital at the time an apartment is offered and therefore is unable to move in at that time, the applicant's original place on the wait list will be maintained

11. As possible admission nears: an interview will be scheduled with the applicant and Resident Care staff; the applicant may tour the facility to affirm the applicant's ability to fulfill the terms of the lease; and, fiscal account numbers and signatures for release of financial documentation and verification of medical expenses will also be obtained as required by HUD.

12. When an apartment becomes available, the Leasing Coordinator will contact the applicant with a potential move-in date. A lease orientation will be scheduled to sign the lease, collect rent and food service payments, and review all information needed to create a smooth transition to Kavod.

13. Refusal of an apartment when offered is cause for the applicant to be removed from the wait list, except in cases where a studio unit is turned down or applicant has medically related reason. The applicant would need to re-apply to be added to the wait list.

IV. Wait List Management

1. Kavod maintains one (1) wait list for admittance to any of our three (3) properties. When a unit becomes vacant, Kavod selects the next applicant from the top of the wait list based on the unit size available, preferences established for the property, income-targeting policies and requirements, and screening policies.
2. To ensure that applicants are appropriately and fairly selected for the next available unit, the following data is included on our wait list:
 - a. Date and time completed application was received by the Leasing Department.
 - b. Name of Head of Household.
 - c. Notation of income level to be used for income-targeting requirements of the project (low-income, very low-income, or extremely low-income).
 - d. Identification of the need for an accessible unit; and
 - e. Unit size
3. If we are unable to rent an accessible unit to an applicant who could benefit from the features of the accessible unit, Kavod will offer the unit to the next applicant on the wait list. The applicant will be required to sign a Lease Addendum which specifies their family will move to a non-accessible unit of the proper size to accommodate an applicant or current resident's reasonable accommodations request if needed.
4. Kavod may close our wait list if the average wait for an apartment is excessive (e.g. one year or more). When Kavod closes the list, we notify potential applicants of such and refrain from accepting additional applications. We will publish notice that our wait list is closed on our web site (www.kavodseniorlife.org) and other publications likely to be read by potential applicants. When Kavod decides to accept applications again, we will publish notice that our wait list is open on our web site and other publications likely to be read by potential applicants. The notice will include specific instructions for applying and the order in which applications will be processed.

V. Regulatory Provisions

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination against persons with disabilities and establishes accessibility requirements by recipients of federal financial assistance in both housing and non-housing programs.

Under both Section 504 and the Fair Housing Act, a resident or applicant makes a reasonable accommodation request whenever he/she makes it clear to Kavod that a request is being made for an exception, change, or adjustment to a rule, policy, practice, service, or physical structure because of his/her disability. A request can be made by the person with the disability, a household member, or someone else acting on the individual's behalf. If the request is made orally, a Kavod staff member will put

the request in writing for the resident or applicant to confirm with their signature.

Title VI of the Civil Rights Act of 1964: Kavod will comply with Title VI of the Civil Rights Act of 1964 which prohibits discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance from HUD.

Title VIII of the Civil Rights Act of 1968 (Fair Housing Amendments Act of 1988), as amended: Kavod will comply with Title VIII of the Civil Rights Act of 1968 which prohibits discrimination based on race, color, national origin, religion, sex, disability or on familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18) in any program or activity receiving federal financial assistance from HUD.

In order to assist residents and applicants with hearing or speech impairments, Kavod provides auxiliary aids to ensure everyone is given equal opportunity to receive and enjoy the benefits of our property (e.g. visual alarms; tactile signs; visual doorbell; reader; interpreter; applications, leases, and other information/communications in large print; TTY 1.800.659.2656; Relay Colorado service).

Any questions regarding Kavod's compliance with Section 504 can be directed to John Skahill, Fair Housing Compliance Officer for Kavod. He can be contacted at 22 South Adams Street, Denver, CO 80209 or 303.399.1146.

VI. Program access for persons with limited English proficiency (LEP)

Kavod will take reasonable steps to ensure meaningful access to the information and services they provide for persons with limited English proficiency (LEP). This includes persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Such steps may include interpreter services and/or written materials translated into other languages.

VII. Policies to comply with the Violence Against Women Act

Kavod complies with the requirements outlined in the Violence Against Women Act. The Violence Against Women Act was promoted for a noble cause to make the lives of victims of abuse easier and to prevent homelessness. Some key points provided in the Act include:

1. A potential resident who certifies they are the victim of domestic violence will be allowed to be admitted even with poor credit and poor landlord evaluations if they can show the cause of these negative factors were caused by domestic violence. Kavod can require certification beyond self-certification of the applicant.
2. It assures that victims of domestic violence, sexual assault, etc. can have access to

the criminal justice system without facing eviction.

3. Where someone is abusive to other members of the household, only the abuser may be evicted. Furthermore, the standards for eviction due to imminent threat have been strengthened.

4. Residents in assisted housing facing violence can be allowed early lease termination and unit transfers for a matter of safety.

5. Victims must certify their status as victims and that the incident in question was a bona fide incident of domestic violence by presenting appropriate documentation to Kavod, and nothing prevents a victim who has committed a crime or violated a lease from being evicted or terminated.

VIII. Occupancy Standards

The initial lease term is for one year. A 30-day notice is required to terminate the lease agreement by the resident.

A security deposit is required equal to one month's rent at the time of lease signing and is payable in the form of personal check or money order. The amount of the security deposit established at move-in does not change when a resident's rent changes. This security deposit is held in an interest bearing account and accrues interest for the resident.

1. Residents agree to comply with all lease requirements and house rules, and are willing to pay the rent and meal program payment in accordance with the lease. Rent and meal program payments can be made by check, money order, or ACH withdrawal from resident's checking or savings account.
2. Residents are permitted to keep common household pets in their units subject to the Pet Agreement and Pet Rules. A pet deposit in the amount of \$300 is required for a dog or cat. The first installment of \$50.00 or less is due upon the signing of this Agreement; the balance will be paid in monthly installments of \$10.00 or less until paid in full. Kavod may use the pet deposit only to pay reasonable expenses directly attributable to the presence of the pet on the property. Such expenses would include, but not be limited to, the cost of repairs and replacement to the unit, fumigation of the unit, and the cost of animal care facilities. This pet deposit is held in an interest bearing account and accrues interest for the resident from the time of the pet's move-in to pet's move-out.
3. According to HUD rules and regulations, Kavod must recertify all residents receiving Section 8 assistance on an annual basis. Re-certifications are scheduled

by building and floor. Recertification notices are sent 120, 90, and 60 days prior to recertification.

4. To maintain our property in decent, safe and sanitary condition, all apartments are inspected at least twice a year – once by our Maintenance department and once by our Leasing department.
5. Kavod offers many services to our residents for their convenience. Following is a list of other charges you may incur for the use of these services:

Office Support Services	
Item	Fee
Envelope – any size	\$ 0.05 per envelope
Fax	\$ 0.25 per fax
Photocopies	\$ 0.10 per page
Maintenance Services	
Apartment Key Replacement	\$ 2.00 per key
Mailbox Key Replacement	\$ 2.00 per key
Building Security Access Card	\$ 25.00 per card
Light Bulb – F15T8 Florescent	\$ 4.90 per bulb
Light Bulb – F32T8TL7 Florescent	\$ 2.70 per bulb
Light Bulb – F40T12CW Florescent	\$ 3.40 per bulb
Light Bulb – F8T5CW Florescent	\$ 3.29 per bulb
Light Bulb – 15T7N Appliance	\$ 3.10 per bulb
Lock Re-keyed	\$ 41.50
Lock Replaced (East & South)	\$ 95.00
Lock Replaced (West)	\$158.00

IX. Unit Transfers

1. Resident Requests for Unit Transfers: Kavod will accept requests for transfer based on the following:
 - a. A unit transfer because of household size
 - b. A new unit because of changes in household composition
 - c. A deeper subsidy (because subsidy is not attached to the physical unit, this type of transfer is not typically required)
 - d. A unit transfer based on the need for an accessible unit
 - e. A unit transfer for a medical reason certified by a doctor or other medical professional
 - f. A unit transfer from a studio to one bedroom apartment
 - g. A unit transfer due to VAWA Rule.

2. All requests must be made in writing. Kavod will verify the need for a unit transfer for accessibility and/or medical reasons in writing from a doctor or medical professional who is familiar with the resident's disability or medical condition. There must be reasonable nexus between the disability and/or medical reasons and the features needed in the alternative unit.

Residents are responsible for leaving the vacated unit clean and undamaged. Upon the unit being vacated by the resident, Kavod will perform a move-out inspection on the vacated unit to ensure there are no damages to the unit. Kavod will list any damages on the move-out inspection form and compare it with the move-in form to determine if the damage is reasonable wear and tear or excessive damage. Residents will be charged for damages that are determined beyond reasonable wear and tear, in compliance with the Security Deposit policy as stated in the Lease.

3. Transfers due to reasonable accommodations: If a member of a resident household becomes disabled with an impairment that requires special accessibility features and the resident requests an accessible unit, Kavod may move the resident into an accessible unit, or make modifications to the resident's existing unit. Transfers due to verifiable medical needs will be made at Kavod's expense unless doing so would constitute an undue financial or administrative burden.

The resident will be added to the Wait List with priority over other applicant's requests for accessible units. The existing security deposit will be transferred to the new unit

4. Transfers to vacate an accessible unit: If Kavod is unable to rent an accessible apartment to an applicant who would benefit from the features of that unit, we will rent the apartment to the next applicant on the wait list. Should Kavod need the accessible unit to accommodate an applicant or current resident's reasonable accommodations request, Kavod will give the existing resident 30 days' notice to transfer to the next available non-accessible unit. The move would be at Kavod's expense. The existing security deposit will be transferred to the new unit.

5. Transfer from Studio to One Bedroom: Residents are allowed to transfer from a Studio unit to a One Bedroom unit at their request and at their cost. Residents submit their request by completing an Apartment Transfer Request form which is available in the East Office after the first initial lease expires (12 month). The resident will be added to the top of the wait list. When a one bedroom unit becomes available, the resident will be contacted by the Leasing Department. The resident may refuse an offer three (3) times for whatever reason. After that he/she will be placed at the end of the Wait List and will have to wait until his/her name comes to the top of the list again. The resident will be required to sign a new lease and appropriate paperwork for the new unit, and pay a new security deposit based on the new lease. The existing security deposit will be processed the same as if resident was vacating the property. An Apartment Transfer Request form may only be submitted once in a twelve (12) month

period.

X. Notification of Policy Changes

Current residents and applicants will be given a 30-day notification in writing of any changes to the Resident Selection Plan & Occupancy Standards, House Rules, Pet Policy, Meal Program requirements, or other charges.

If you have any questions regarding our Resident Selection Plan & Occupancy Standards, please contact our Leasing Department at 303.399.1146.