

DESOTO BASS COURTS

SITE-BASED WAITLIST POLICY AND VACANCY OUTREACH PROCEDURE

A Supplement to the GDPM Admissions and Continued Occupancy Policy (ACOP)

I. Purpose and Scope

This policy establishes site-specific waitlist administration procedures for DeSoto Bass Courts (hereinafter "**DeSoto**" or "**the Development**"), a public housing development owned and managed by Greater Dayton Premier Management ("**GDPM**") in Dayton, Ohio.

This policy is intended to:

- Accelerate leasing at DeSoto Bass to improve the Development's occupancy rate and PHAS ("**Public Housing Assessment System**") score under 24 CFR Part 902;
- Establish a structured vacancy outreach process that complies with HUD waitlist administration requirements under 24 CFR Part 960 and the HUD Public Housing Occupancy Guidebook;
- Ensure that all applicants on the DeSoto Bass waitlist are afforded a fair and non-discriminatory opportunity to express their continued interest in a unit; and
- Reduce the administrative burden on site management caused by contacting large numbers of applicants sequentially under the standard date-and-time-stamp selection process when significant vacancies exist.

In all instances, this policy shall be read consistently with GDPM's ACOP. Where there is any conflict, the ACOP governs unless this policy is more specific to DeSoto Bass site-based waitlist operations, in which case this policy controls for that Development. GDPM will reflect this supplemental policy in its current Annual Plan update and applicable ACOP revision.

II. Regulatory Authority

This policy is issued under the following regulatory and statutory authorities:

- 24 CFR Part 960 — Admission to, and Occupancy of, Public Housing
- 24 CFR § 903.7(b) — PHA Plan: Statement of Policy on Waiting List Procedures
- 24 CFR § 903.7(b)(2)(v) — Site-Based Waiting Lists
- 24 CFR § 960.202 — Eligibility and Targeting
- 24 CFR § 960.206 — Waiting List: Local Preferences
- 24 CFR Part 902 — Public Housing Assessment System (PHAS)
- 24 CFR Part 5, Subpart A — Fair Housing and Equal Opportunity Requirements
- 24 CFR Part 8 — Nondiscrimination Based on Handicap (Section 504)
- 24 CFR Part 100 — Fair Housing Act
- Quality Housing and Work Responsibility Act of 1998 (QHWRA)
- HUD Public Housing Occupancy Guidebook, Chapter on Waiting List and Tenant Selection

III. **Applicability and Relationship to the ACOP**

This policy applies exclusively to the waitlist for DeSoto Bass Courts and does not alter waitlist administration for any other GDPM development. All standard eligibility, screening, income-targeting, preferences, and tenant selection criteria set forth in the ACOP remain in full force and effect. This policy solely modifies the process by which GDPM contacts waitlisted applicants when multiple unit vacancies exist at DeSoto Bass, as further described in Section 6 below.

IV. **Standard Waitlist Administration**

Except as modified by this policy's vacancy outreach procedure (Section 6), the DeSoto waitlist shall be administered as follows:

- A. *Waitlist Order:*** Applicants are placed on the DeSoto Bass waitlist based on date and time of application, subject to any applicable preferences as set forth in the ACOP. The standard selection process draws applicants from the top of the list in date-and-time-stamp order.
- B. *Waitlist Updates:*** GDPM shall periodically update the DeSoto Bass waitlist and shall contact applicants to confirm continued interest and verify eligibility information. Applicants who fail to respond to update notices within the period specified in the notice may be removed from the waitlist in accordance with the ACOP and this policy's removal procedures in Section 7.
- C. *Unit Offers: Standard Process:*** Under the standard process, when a single unit becomes available at DeSoto Bass, the site manager shall contact applicants in date-and-time-stamp order to fill the vacancy. An applicant who declines or does not respond within the timeframe specified in the ACOP may be offered the unit to the next eligible applicant, and the declination shall be handled per ACOP provisions governing refusals.

V. **Vacancy Outreach Procedure — Multiple Vacancy Condition**

- A. *Purpose:*** When DeSoto Bass experiences a significant number of simultaneous vacancies, the standard sequential contact process becomes operationally burdensome and impairs the Development's ability to lease units promptly, which adversely affects GDPM's PHAS occupancy score. This section establishes an accelerated, HUD-compliant vacancy outreach procedure to address such conditions while preserving applicant rights and fair housing requirements.
- B. *Triggering Condition:*** The Vacancy Outreach Procedure described in this Section 6 shall be activated when GDPM determines that three (3) or more units at DeSoto Bass are simultaneously vacant and available for occupancy. GDPM's Chief Operating Officer (or designee) shall authorize activation of this procedure in writing.
- C. *Simultaneous Notice to All Waitlisted Applicants:*** Upon activation of the Vacancy Outreach Procedure, GDPM shall transmit a written Vacancy Interest Notice ("**VIN**") simultaneously to all applicants currently on the DeSoto Bass waitlist. The notice shall be sent by first-class U.S. mail to the applicant's address of record. Where GDPM has an email address or telephone

number on file, the notice shall also be sent by email and/or text message as supplemental contact methods. GDPM shall document all methods of notice used for each applicant.

D. Content of the Vacancy Interest Notice: The Vacancy Interest Notice shall contain, at minimum, the following information:

- A statement that GDPM has multiple units currently available at DeSoto Bass Courts;
- The number of available units and the bedroom sizes available;
- A statement that units will be offered on a first-come, first-served basis among responding applicants who confirm their interest, subject to applicant eligibility verification, income-targeting requirements, and ACOP preferences;
- The specific deadline by which the applicant must contact GDPM to express continued interest (no fewer than fifteen (15) calendar days from the date the notice is mailed, except as extended for reasonable accommodation under Section 6.7);
- Clear instructions on how to respond (e.g., by telephone, in person, by email, or by mail), including the name and contact information of the GDPM staff member to contact;
- A statement that failure to respond by the deadline will result in removal from the DeSoto Bass waitlist, with information on the applicant's right to request an informal review as provided in Section 7.2;
- A statement that reasonable accommodations are available to persons with disabilities who need assistance responding to the notice, and contact information to request such accommodations.

E. Response Period: Applicants shall have a minimum of fifteen (15) calendar days from the date the Vacancy Interest Notice is mailed to contact GDPM and express their continued interest in leasing at DeSoto. GDPM may extend this period at its discretion or as required by reasonable accommodation. The fifteen (15)-day minimum response period is established to provide applicants who may have moved, changed contact information, or who have difficulty accessing mail a reasonable opportunity to respond before being removed from the waitlist, consistent with HUD guidance on waitlist maintenance.

F. First-Come, First-Served Selection Among Respondents: Units shall be offered to eligible responding applicants in the order in which GDPM receives their confirmed expressions of interest during the response period, subject to the following:

- **Income Targeting:** GDPM shall continue to meet HUD income-targeting requirements under 24 CFR § 960.202(b) (at least 40% of new admissions must be extremely low income). Responses shall be evaluated and units offered consistent with this requirement.
- **ACOP Preferences:** Applicants who respond and hold a verified preference under the ACOP shall be given priority over non-preference applicants who respond at the same time or earlier, consistent with the ACOP's preference hierarchy.

- **Bedroom Size Eligibility:** Unit offers shall only be made to applicants whose household size qualifies for the available bedroom size under GDPM's occupancy standards.
- **Eligibility Verification:** All applicants selected for a unit offer must complete the full eligibility determination process prior to lease execution. Submission of a response to the VIN does not constitute an offer of housing or guarantee of placement.
- **Accessible Units:** Accessible units shall continue to be offered first to applicants who need accessibility features consistent with 24 CFR § 8.27 and GDPM's ACOP.

GDPM staff shall maintain a timestamped log of all applicant responses, including the date, time, and method of each response received, to document the order of responses for selection purposes.

G. Reasonable Accommodation: GDPM shall provide reasonable accommodations to persons with disabilities throughout the Vacancy Outreach Procedure, including but not limited to:

- Extending the response deadline for applicants whose disability prevented timely response;
- Offering alternative methods of communication for applicants who cannot respond in the standard manner;
- Reinstating an applicant removed from the waitlist if the failure to respond was caused by a disability, consistent with 24 CFR § 982.204(a)(2) as applied by analogy to public housing and 24 CFR Part 8.

Applicants seeking reasonable accommodations shall contact GDPM's Section 504/ADA Coordinator. GDPM shall document all reasonable accommodation requests and determinations.

H. No Guaranty of Unit Offer to All Respondents: Responding to the Vacancy Interest Notice confirms the applicant's continued interest in DeSoto and preserves the applicant's place on the waitlist. It does not guarantee an immediate unit offer. Applicants who respond but are not reached during the current vacancy outreach cycle shall remain on the waitlist in their original date-and-time-stamp order and shall be contacted through future vacancy outreach cycles or the standard sequential selection process, as applicable.

VI. Removal from the Waitlist and Informal Review Rights

A. Removal for Failure to Respond: An applicant who fails to respond to a Vacancy Interest Notice within the response period specified in the notice shall be removed from the DeSoto waitlist. Before removal, GDPM shall have used all available contact methods on file (mail, email, and/or telephone) to reach the applicant, consistent with HUD guidance encouraging PHAs to use a variety of means prior to removing an unresponsive applicant. GDPM shall send a written removal notice to the applicant's address of record informing the applicant that they have been removed from the DeSoto Bass waitlist, the reason for removal, and the applicant's right to request an informal review.

- B. Informal Review Rights:** An applicant removed from the DeSoto Bass waitlist has the right to request an informal review of that decision pursuant to GDPM's grievance procedure under 24 CFR § 966.52 and the ACOP. The request for informal review must be received by GDPM within ten (10) business days of the date of the removal notice.
- C. Reinstatement:** An applicant shall be reinstated to their prior position on the DeSoto waitlist if GDPM determines through the informal review process, or upon the applicant's timely demonstration, that the failure to respond was caused by:
- A disability of a family member (in which case reinstatement shall be granted as a reasonable accommodation under 24 CFR Part 8);
 - A documented failure of the notice to reach the applicant due to a postal or other delivery error;
 - A documented change in address not yet updated with GDPM through no fault of the applicant; or
 - Other extraordinary circumstances beyond the applicant's control, as determined by GDPM in its reasonable discretion.

VII. Fair Housing and Civil Rights Compliance

This policy shall be implemented in full compliance with all applicable federal, state, and local fair housing and civil rights laws and regulations

VIII. Recordkeeping and Reporting

GDPM shall maintain complete and accurate records for each Vacancy Outreach Procedure activation, including:

- The date and authorization for activation of the procedure;
- The number and bedroom sizes of vacant units triggering the procedure;
- A copy of the Vacancy Interest Notice as issued;
- Documentation of all notice methods used for each applicant (mail confirmation, email, phone/text records);
- A timestamped log of all applicant responses received;
- Records of unit offers made, accepted, and declined during the cycle;
- Documentation of all reasonable accommodation requests and GDPM's determinations;
- Removal notices issued and any informal review requests and outcomes.

Records shall be retained for a minimum of three (3) years or as otherwise required by HUD regulations, whichever is longer, and shall be made available to HUD upon request pursuant to 24 CFR §§ 107.30 and 1.6(b).