

GREATER DAYTON PREMIER MANAGEMENT

Montgomery County, Ohio

ADMISSIONS AND CONTINUED OCCUPANCY POLICY CHAPTER 4 AMENDMENT

JURISDICTION-WIDE PUBLIC HOUSING WAITING LIST POLICY WITH RANDOM SELECTION (LOTTERY) TENANT SELECTION PROCEDURE

Effective Date:	[INSERT DATE]
Board Approval Date:	[INSERT DATE]
Amends ACOP:	Chapter 4 – Application, Waiting List and Tenant Selection
Applicable Regulation:	24 CFR Part 960; HUD PIH Notice 2012-34; Public Housing Occupancy Guidebook
Prepared By:	GDPM Admissions & Compliance Division

SECTION 1: PURPOSE AND SCOPE

This policy amendment to Chapter 4 of the Greater Dayton Premier Management (GDPM) Admissions and Continued Occupancy Policy (ACOP) establishes a single, jurisdiction-wide waiting list for all GDPM public housing programs and a random-selection (lottery) method for tenant selection from that waiting list. This amendment supersedes any prior Chapter 4 provisions that established separate, site-based or development-specific waiting lists for public housing units under GDPM's direct management within Montgomery County, Ohio.

This policy is adopted in accordance with:

- 24 CFR Part 960 – Admission to, and Occupancy of, Public Housing
- 24 CFR § 960.202 – Income targeting requirements
- 24 CFR § 903.7(b) – PHA Plan requirements for waiting list administration
- HUD PIH Notice 2012-34 – Waiting List Administration for the Public Housing and Housing Choice Voucher Programs
- HUD Public Housing Occupancy Guidebook – Waiting List and Tenant Selection Chapter

- Title VI of the Civil Rights Act of 1964; Fair Housing Act of 1968 (as amended); Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act; Violence Against Women Reauthorization Act

SECTION 2: DEFINITIONS

For purposes of this policy, the following terms are defined:

Agency-Wide / Jurisdiction-Wide Waiting List: A single consolidated waiting list maintained by GDPM for all available public housing units throughout its jurisdiction (all of Montgomery County, Ohio), regardless of development or site location.

Applicant: Any individual or family that has submitted a completed application for public housing assistance to GDPM during an open waiting list period and has been determined preliminarily eligible for placement on the waiting list.

Application Period: The specific window of time, announced by GDPM in a public notice, during which eligible individuals and families may submit a preliminary application for placement on the jurisdiction-wide public housing Waiting List.

Eligible Family: A low-income family that meets all HUD and GDPM eligibility requirements for the public housing program as set forth in Chapter 3 of the ACOP.

Extremely Low-Income (ELI) Family: A family whose annual income does not exceed the higher of: (a) 30% of the Area Median Income (AMI) for the Montgomery County, Ohio HUD-defined Metropolitan Statistical Area; or (b) the federal poverty line, as defined at 24 CFR § 5.603.

Random Selection / Lottery: A method of tenant selection whereby all eligible applicants on the waiting list have an equal probability of being selected for a housing offer, without regard to application date or time, subject to applicable local preferences and income targeting requirements.

Local Preference: A criterion established by GDPM under 24 CFR § 960.206 that may be used to give priority among otherwise equally situated applicants. Preferences do not affect random lottery ranking except as specified herein.

Special Admission: A non-competitive admission made outside the waiting list process, as authorized by HUD, including but not limited to: residents displaced by GDPM demolition or disposition activities; families in HUD-funded special-purpose programs; and over-income families authorized by HUD.

Accessible Unit: A public housing dwelling unit designed or modified to meet the accessibility requirements of Section 504 of the Rehabilitation Act of 1973, the Fair Housing Act, or the Americans with Disabilities Act.

SECTION 3: ESTABLISHMENT OF JURISDICTION-WIDE WAITING LIST

3.1 Single Waiting List

GDPM shall maintain one (1) jurisdiction-wide public housing waiting list (the “**Waiting List**”) for all available public housing units within its jurisdiction. The Waiting List shall serve all GDPM-owned and managed public housing developments in Montgomery County, Ohio. Separate site-based or development-specific waiting lists for general public housing admissions are hereby eliminated upon adoption of this policy.

GDPM may maintain sub-lists within the jurisdiction-wide Waiting List to track applicant preferences for specific bedroom sizes, development types (family, elderly/disabled, mixed-population), or accessibility needs, solely for the purpose of matching applicants with appropriate available units. Such sub-lists shall not constitute separate waiting lists and shall not affect the applicant’s overall position or lottery rank on the Waiting List. *[Authority: 24 CFR § 903.7(b)(2)(v); HUD PHOG Waiting List Chapter § 2.3; PIH Notice 2012-34]*

3.2 Designated Housing

To the extent GDPM operates developments or portions of developments designated exclusively for elderly families, disabled families, or mixed-population (elderly and disabled) families pursuant to 24 CFR Part 945 and HUD-approved Designated Housing Plans, GDPM may maintain a separate sub-list or administer discrete selection pools for such designated units consistent with 24 CFR § 960.407 and the relevant Designated Housing Plan. The procedures governing random selection shall apply equally to designated housing sub-lists. *[Authority: 24 CFR § 960.407; 24 CFR Part 945]*

3.3 Relationship to Other Program Waiting Lists

The jurisdiction-wide public housing Waiting List is separate from GDPM’s Housing Choice Voucher (HCV) program waiting list. When the Waiting List is open and an applicant is placed on the public housing Waiting List, GDPM shall offer to also place the applicant on the HCV waiting list if that list is simultaneously open, and vice versa, consistent with 24 CFR § 982.205(a)(2). *[Authority: 24 CFR § 982.205(a)(2)]*

SECTION 4: OPENING AND CLOSING THE WAITING LIST

4.1 Decision to Open the Waiting List

GDPM shall determine whether to open the Waiting List on an indefinite or a time-limited basis after careful analysis of the following factors:

- Current length of the Waiting List and estimated wait time for housing
- Current and projected unit availability and turnover rates

- Whether the Waiting List contains a sufficient pool of eligible applicants to ensure timely occupancy of new and turnover units
- Affirmative outreach and fair housing objectives
- Administrative capacity and resources

GDPM may open the Waiting List to all applicants or, consistent with fair housing requirements, to specific bedroom-size categories if wait times for those categories are not excessive. *[Authority: HUD PHOG Waiting List Chapter § 2.1; PIH Notice 2012-34]*

4.2 Public Notice of Waiting List Opening

Before opening the Waiting List, GDPM shall publish a public notice at least thirty (30) calendar days in advance of the opening date. The notice shall be published in a newspaper of general circulation in Montgomery County and through additional means designed to reach all segments of the eligible population, including:

- GDPM official website (www.gdpm.org)
- GDPM social media platforms
- Minority and foreign-language media as required by GDPM's Language Access Plan
- Distribution to local social service agencies, homeless shelters, domestic violence shelters, hospitals, mental health facilities, and other community organizations serving low-income households
- Notification to HUD's Cleveland Field Office as required

The public notice shall include at minimum:

- The dates and times the Waiting List will be open
- All available application methods
- Instructions for obtaining and submitting an application
- A statement that tenant selection from the Waiting List will be conducted by random lottery and that no local preferences are applied
- Income limits and basic eligibility requirements
- Information on how to request a reasonable accommodation in the application process
- A non-discrimination statement in English and any languages required under GDPM's LEP Plan

[Authority: 24 CFR § 964.30; PIH Notice 2012-34; HUD PHOG Waiting List Chapter § 2.1, 2.2]

4.3 Application Acceptance Period

When opening the Waiting List on a time-limited basis, GDPM shall hold the Waiting List open for a period of not less than thirty (30) calendar days to ensure that a broad range of potential applicants has a meaningful opportunity to apply. Applications shall be accepted through multiple methods and

at multiple locations to ensure access by persons with disabilities, persons with limited English proficiency, persons with inflexible work schedules, and persons in all neighborhoods throughout Montgomery County. The Application Period shall have a defined opening date and time and a defined closing date and time, as specified in the public notice. No applications shall be accepted before the opening or after the closing of an Application Period. GDPM may open an Application Period on a periodic or as-needed basis, as determined by GDPM in accordance with Section 4 of this policy.

Application methods shall include at minimum:

- Online application through GDPM's website, accessible 24 hours per day during the open period
- Mail-in paper application
- In-person application at GDPM's main office (400 Wayne Avenue, Dayton, Ohio 45410) during regular business hours
- Reasonable accommodation alternatives for applicants with disabilities who cannot use standard methods

[Authority: HUD PHOG Waiting List Chapter § 2.1, 3.1; PIH Notice 2012-34]

4.4 Closing the Waiting List

GDPM may close the Waiting List when the number of applicants is sufficient to fill anticipated vacancies for a reasonable period. GDPM shall publish a notice of the Waiting List closure in the same manner as the opening notice. The notice shall include the date on which the Waiting List will close, state that no further applications will be accepted after that date, and advise applicants already on the list of their continued placement.

GDPM shall not accept new applications after the announced closing date unless GDPM subsequently reopens the Waiting List with a new public notice. The status of the Waiting List (open or closed) shall be prominently displayed on GDPM's website at all times. *[Authority: PIH Notice 2012-34; HUD PHOG Waiting List Chapter § 2.5.2]*

SECTION 5: APPLICATION PROCESS

5.1 Preliminary Application

Persons wishing to be placed on the Waiting List shall submit a preliminary application during an open application period. The preliminary application shall request only the information necessary to determine basic program eligibility and to place the applicant on the Waiting List. GDPM shall not require full eligibility documentation at the preliminary application stage.

The preliminary application shall collect:

- Name, date of birth, and Social Security Number (or certification of non-possession) for all household members, as required by 24 CFR § 5.216
- Contact information (mailing address, telephone, email if available)
- Family composition and household size
- Citizenship/eligible immigration status certification
- Estimated annual gross income and income sources
- Any claimed local preference(s) (self-certification at application stage, verification at selection)
- Unit bedroom size needed
- Accessibility needs
- Race and ethnicity data (self-identification; required for HUD reporting under 24 CFR § 1.6(b))

GDPM shall not collect information about criminal history at the preliminary application stage. Criminal history screening shall be conducted only after a family has been selected from the Waiting List and is under active review for a specific unit offer. *[Authority: 24 CFR § 5.216; 24 CFR §§ 960.203–960.204; HUD PHOG Waiting List Chapter § 4.1]*

5.2 Confirmation of Application

Upon submission of a complete preliminary application, GDPM shall provide the applicant with a written or electronic confirmation that includes:

- Confirmation that the application was received
- Notice that placement on the Waiting List will be determined by random lottery after the close of the application period
- The applicant’s contact information as recorded by GDPM
- Instructions for updating contact information
- GDPM contact information for questions or to request a reasonable accommodation

SECTION 6: RANDOM SELECTION (LOTTERY) PROCEDURE

6.1 Policy Statement on Random Selection

GDPM Policy – Random Selection (Lottery)

Greater Dayton Premier Management shall select applicants for placement on, and advancement within, the jurisdiction-wide public housing Waiting List by means of a random lottery. All eligible applicants who submit a complete preliminary application during an open application period shall have an equal and unbiased probability of selection, subject only to HUD income targeting requirements as described in this policy. No local preferences are established or applied. No priority shall be given based on the date or time an application was received.

Use of a random lottery promotes fairness, equal opportunity, and compliance with GDPM's fair housing and civil rights obligations by ensuring that no applicant is advantaged or disadvantaged based on the speed of application submission, proximity to a GDPM office, access to technology, or any other factor unrelated to housing need or eligibility. GDPM has determined that this approach is consistent with HUD requirements and reflects local housing needs and priorities. *[Authority: HUD PHOG Waiting List Chapter § 2.1, 2.3; PIH Notice 2012-34; 24 CFR § 960.206]*

6.2 Lottery Procedures

At the close of each application period, GDPM shall conduct a lottery to rank all eligible preliminary applicants. The lottery shall be conducted as follows:

1. GDPM shall compile a complete list of all preliminary applicants who submitted a timely and sufficiently complete application during the open period.
2. A computer-generated random number shall be assigned to each applicant household using a statistically validated random number generation program or software. The random number assignment process shall be documented and retained.
3. Applicant households shall be ranked in ascending order of their assigned random numbers to produce the Waiting List rank order.
4. Income targeting adjustments shall be applied as described in Section 7 of this policy.
5. The final ranked Waiting List shall serve as the order in which households are contacted and offered available units, subject to unit size availability, bedroom-size sub-list placement, and applicable GDPM screening criteria.

6.3 Documentation and Transparency

GDPM shall maintain complete documentation of each lottery process, including:

- The software or method used for random number generation
- The date and time the lottery was conducted
- The identity of GDPM staff who administered the lottery
- A record of the ranked applicant list produced by the lottery (maintained confidentially)

GDPM shall not publicly disclose individual applicants' lottery ranks or contact information. However, each applicant shall be notified of his or her placement on the Waiting List and may inquire about his or her position. GDPM shall make aggregate information about the Waiting List size available to HUD and to the public consistent with 24 CFR Part 903.

6.4 Carryover Applicants

If GDPM opens a new application period while an existing Waiting List remains active, applicants already on the existing Waiting List shall retain their position. New applicants admitted through the new lottery shall be ranked below existing applicants, subject to applicable income targeting

adjustments. GDPM may, in its discretion, merge or replace the Waiting List at the time of a new opening; any such decision shall be described in the public notice and the PHA Plan.

SECTION 7: NO LOCAL PREFERENCES – EQUAL TREATMENT OF ALL APPLICANTS

GDPM has determined not to establish any local admission preferences for the public housing Waiting List. All eligible applicants shall be treated, and placement on and selection from the Waiting List shall be governed solely by the random lottery rank assigned pursuant to Section 6, subject only to HUD income targeting requirements set forth in Section 8.

GDPM's decision to operate without local preferences is consistent with 24 CFR § 960.206, which permits but does not require PHAs to adopt local preferences. By operating preference-free, GDPM ensures the broadest possible equal opportunity for all eligible low-income families in Montgomery County, avoids any disparate impact concerns associated with preference systems, and simplifies Waiting List administration.

This policy shall be reflected in GDPM's PHA Annual Plan. Should GDPM elect in the future to establish local preferences, it shall do so through the Significant Amendment process, with public notice, public comment, Board approval, and HUD plan submission, consistent with 24 CFR § 960.206 and 24 CFR Part 903. *[Authority: 24 CFR § 960.206; HUD PHOG Waiting List Chapter § 5]*

SECTION 8: INCOME TARGETING REQUIREMENTS

In accordance with 24 CFR § 960.202(b) and the Quality Housing and Work Responsibility Act of 1998, GDPM shall ensure that not less than forty percent (40%) of the families admitted to the public housing program during any given federal fiscal year are Extremely Low-Income (ELI) families, as defined in Section 2 of this policy.

To achieve income targeting compliance, GDPM shall track admissions on a rolling fiscal-year basis. When selecting applicants from the Waiting List, if GDPM determines that it is at risk of failing to meet the 40% ELI targeting requirement for the fiscal year, GDPM may bypass non-ELI applicants (regardless of lottery rank) to select the next ELI applicant on the Waiting List. GDPM shall document each such bypass and shall restore bypassed applicants to their original position as soon as the ELI targeting requirement is satisfied.

GDPM shall maintain a tracking system to monitor the percentage of ELI admissions each fiscal year and shall report income targeting data to HUD as required. *[Authority: 24 CFR § 960.202(b); 42 U.S.C. § 1437n(b)]*

SECTION 9: MAINTAINING THE WAITING LIST

9.1 Annual Update of Applicant Information

GDPM shall conduct an annual update of the Waiting List by mailing (or emailing, if email is on file) a written notice to each applicant on the Waiting List requesting confirmation of continued interest and updated contact and household information. The notice shall:

- State that failure to respond within thirty (30) calendar days will result in removal from the Waiting List
- Provide at least two methods of response (mail, email, telephone, in person)
- Include information on requesting a reasonable accommodation to the update process
- Be sent to the last address of record and any additional contact information on file

Each applicant is solely responsible for responding to the annual update notice within the timeframe stated in that notice. Failure to respond by the deadline specified in the notice will result in removal from the Waiting List without further contact from GDPM. Removal from the Waiting List is not subject to the grievance procedure; however, GDPM shall offer applicants an informal review to dispute an erroneous removal. *[Authority: HUD PHOG Waiting List Chapter § 2.4; PIH Notice 2012-34]*

9.2 Applicant Obligations

Each applicant on the Waiting List is responsible for:

- Notifying GDPM promptly, and in any event within thirty (30) calendar days, of any change in mailing address, telephone number, email address, or household composition
- Responding to all GDPM inquiries and update notices in a timely manner
- Continuing to meet all eligibility requirements while on the Waiting List

GDPM shall not be responsible for mail or communications that are not received due to an applicant's failure to update contact information.

9.3 Removal from the Waiting List

GDPM shall remove an applicant from the Waiting List under the following circumstances:

- The applicant requests removal in writing
- The applicant fails to respond to the annual update notice by the deadline specified in that notice
- The applicant is admitted to housing from the Waiting List
- GDPM determines, at the time of selection, that the applicant fails to meet eligibility requirements (in which case GDPM shall provide written notice of denial and informal review rights)
- The applicant refuses a unit offer without good cause (see Section 10.5)

GDPM shall document all removal actions and the reason for each removal. *[Authority: HUD PHOG Waiting List Chapter § 2.4; 24 CFR § 960.203; PIH Notice 2012-34]*

9.4 Reinstatement to the Waiting List

An applicant who has been removed from the Waiting List in error, or who successfully demonstrates at an informal review that removal was improper, shall be reinstated to the Waiting List at his or her original position. An applicant who was removed for good cause may reapply during the next open application period and will receive a new lottery position.

SECTION 10: SELECTION FROM THE WAITING LIST AND UNIT OFFERS

10.1 Order of Selection

When a public housing unit becomes available, GDPM shall proceed as follows in making unit offers:

1. GDPM shall first determine if any existing residents are entitled to a transfer that takes priority over new admissions (e.g., emergency transfers, accessible unit transfers as required by Section 504). Eligible transfers shall be processed before Waiting List selections.
2. If no priority transfer is applicable, GDPM shall select from the Waiting List in the order established by the lottery ranking, within preference tiers, subject to income targeting requirements (Section 8), unit bedroom size, and unit type.
3. GDPM shall match available units to applicants based on bedroom size need (occupancy standards in Chapter 5 of the ACOP), accessibility requirements, and designated housing restrictions.
4. GDPM shall contact the highest-ranked eligible applicant matching the available unit profile and extend a written or verbal offer.

GDPM shall maintain sufficient depth in the Waiting List to fill vacancies promptly, and shall contact multiple applicants if necessary to ensure timely occupancy. *[Authority: 24 CFR § 960.202; 24 CFR § 8.27; HUD PHOG Waiting List Chapter § 6]*

10.2 Accessible Units

Consistent with Section 504 of the Rehabilitation Act and HUD's regulations at 24 CFR § 8.27, GDPM shall give priority for accessible units to applicants (and current residents) who need the accessibility features of those units. If no applicant with an accessibility need is on the Waiting List or available for the unit, GDPM may offer the unit to the next eligible applicant with a notice that the unit contains accessibility features and may be needed in the future by a person with a disability. *[Authority: 24 CFR § 8.27; HUD PHOG Waiting List Chapter § 1.2]*

10.3 Unit Offer and Response Period

Upon selection from the Waiting List, GDPM shall notify the applicant in writing (by mail and, if available, by email or telephone) that a unit offer is pending and that the applicant must schedule an eligibility interview and full application appointment. The applicant shall be given not less than ten (10) calendar days from the date of the notice to respond. GDPM shall make reasonable accommodations for applicants with disabilities who need additional time or alternative communication methods.

10.4 Full Application and Eligibility Determination

At the time of selection from the Waiting List, the applicant shall complete a full application and provide documentation of all eligibility factors, including:

- Identity and citizenship/eligible immigration status of all household members (24 CFR Part 5, Subpart E)
- Social Security Numbers for all household members age six (6) and older (24 CFR § 5.216)
- Income and assets for all household members
- Consent forms for third-party verification

GDPM shall conduct criminal history and tenant screening checks at this stage, in accordance with Chapter 3 of the ACOP and applicable HUD requirements. GDPM's tenant screening criteria shall be individualized, evidence-based, and consistent with HUD's guidance on the use of criminal records in housing decisions.

10.5 Unit Offer Refusals

An applicant who refuses a unit offer shall be required to state the reason for refusal in writing at the time of refusal.

Refusal for good cause, as defined in Chapter 5 of the ACOP, shall not result in removal from the Waiting List, and the applicant shall retain his or her lottery rank position. Good cause includes, but is not limited to, a documented medical inability to view or accept the unit, a unit that does not meet the applicant's verified accessibility needs, or a unit that does not match the bedroom size determined appropriate for the family.

GDPM Policy – Refusal Without Good Cause

Any refusal of a unit offer by an applicant without good cause shall result in immediate removal from the Waiting List. The applicant will be notified in writing of the removal and the reason therefor, and of the right to request an informal review pursuant to Chapter 14 of the ACOP. An applicant removed under this provision may reapply only during a subsequent open application period and will receive a new lottery position.

GDPM shall document each refusal, the stated reason, and GDPM's determination as to whether good cause existed. GDPM's policy on what constitutes good cause for refusal is set forth in Chapter 5 of the ACOP.

10.6 Denial of Admission

If GDPM determines that an applicant selected from the Waiting List is ineligible for admission, GDPM shall provide written notice of denial stating the specific reason(s) for denial and the applicant's right to request an informal review pursuant to the grievance procedures in Chapter 14 of the ACOP and 24 CFR § 960.203(d). *[Authority: 24 CFR § 960.203(d); HUD PHOG Waiting List Chapter § 3 (Rejecting an Application)]*

SECTION 11: SPECIAL ADMISSIONS

Certain admissions are not made through the Waiting List process. Special admissions authorized by HUD regulations include but are not limited to:

- Families displaced by GDPM actions (demolition, disposition, RAD/PBV conversion)
- Families eligible for occupancy under HUD-funded Special Purpose programs (e.g., HUD-VASH, Mainstream Voucher conversions) where HUD authorizes direct admission
- Families admitted under court-ordered settlement agreements or consent decrees

Special admissions shall be documented by GDPM and reported in the PHA Annual Plan and HUD data systems. Special admissions shall not displace or reduce the rights of applicants on the Waiting List. *[Authority: 24 CFR § 960.201(b); HUD PIH Notices applicable to specific programs]*

SECTION 12: DECONCENTRATION AND INCOME MIXING

Consistent with 24 CFR § 903.7 and GDPM's deconcentration policy, GDPM shall analyze income characteristics of its public housing developments and, to the extent feasible, implement admission strategies that promote income mixing and deconcentration of poverty. Under this jurisdiction-wide, random-selection Waiting List policy, the following measures support deconcentration goals:

- A single jurisdiction-wide list that does not restrict low-income applicants to high-poverty developments
- Affirmative outreach to higher-income eligible families and to families in all neighborhoods in Montgomery County
- Offering applicants information about all available GDPM developments, including location, amenities, transportation access, and school information, to support informed choices

[Authority: 24 CFR § 903.7; 24 CFR § 960.202(c)]

SECTION 13: FAIR HOUSING, CIVIL RIGHTS, AND REASONABLE ACCOMMODATIONS

13.1 Nondiscrimination

GDPM shall administer the Waiting List and all tenant selection processes in full compliance with applicable federal, state, and local fair housing and civil rights laws, including:

- Title VI of the Civil Rights Act of 1964 (24 CFR Part 1)
- Title VIII of the Civil Rights Act of 1968 – Fair Housing Act (as amended; 24 CFR Part 100)
- Section 504 of the Rehabilitation Act of 1973 (24 CFR Part 8)
- Title II of the Americans with Disabilities Act (28 CFR Part 35)
- Age Discrimination Act of 1975 (24 CFR Part 146)
- Violence Against Women Reauthorization Act (VAWA) – applicable public housing provisions
- Executive Order 11063 – Equal Opportunity in Housing

No applicant shall be denied placement on, or selection from, the Waiting List on the basis of race, color, national origin, religion, sex, age, familial status, disability, marital status, sexual orientation, or gender identity.

13.2 Reasonable Accommodations

GDPM shall provide reasonable accommodations to applicants and program participants with disabilities throughout the Waiting List and tenant selection process, including but not limited to:

- Alternative application formats (large print, braille, audio) upon request
- Assistance completing or submitting applications for persons who are unable to do so independently due to a disability
- Extended response periods for persons with disabilities who need additional time
- Communicating with applicants through alternative means (TTY, relay service, email, home visit)

Requests for reasonable accommodation shall be considered on an individualized basis and will typically be granted unless doing so would impose an undue financial or administrative burden or fundamentally alter the nature of the program. GDPM's reasonable accommodation procedures are set forth in Chapter 2 of the ACOP. GDPM shall include information about how to request reasonable accommodations in all public notices of Waiting List openings. *[Authority: 24 CFR § 8.6; 28 CFR Part 35, Subpart E; Fair Housing Act]*

13.3 Limited English Proficiency

GDPM shall ensure meaningful access to the Waiting List application process and all tenant selection communications for persons with Limited English Proficiency (LEP), consistent with GDPM's Language Access Plan and HUD's LEP Guidance (72 FR 2732). All public notices shall be available in languages identified as required by GDPM's four-factor LEP analysis. GDPM shall provide oral

interpretation services free of charge upon request. *[Authority: 24 CFR § 1.4(b)(2)(ii); Title VI; 72 FR 2732 (HUD LEP Guidance)]*

13.4 Affirmative Marketing and Outreach

GDPM shall conduct affirmative outreach and marketing whenever the Waiting List is open to ensure that individuals of similar income levels throughout the housing market area (Montgomery County) have a like range of housing choices regardless of protected class. Outreach shall be targeted to reach groups that are not currently well-represented on the Waiting List or in GDPM's public housing communities relative to their presence in the eligible population. *[Authority: 24 CFR § 964.30; 24 CFR § 200.610; PIH Notice 2012-34]*

SECTION 14: HUD REPORTING, PHA PLAN, AND POLICY AMENDMENT PROCEDURES

14.1 PHA Annual Plan and HUD Reporting

This jurisdiction-wide Waiting List policy and any material amendments thereto shall be reflected in GDPM's PHA Annual Plan submitted to HUD consistent with 24 CFR Part 903. GDPM shall provide HUD's Cleveland Field Office with information on the Waiting List, including:

- The number of families on the Waiting List
- The opening and closing dates of the Waiting List
- Income characteristics and preference tier distributions
- Demographic data on the Waiting List as required for civil rights and income-targeting monitoring
- Description of the random selection lottery procedure

14.2 Significant Amendment

This policy was adopted as a Significant Amendment to the GDPM ACOP and PHA Annual Plan in accordance with 24 CFR § 903.21 and GDPM's substantial deviation and significant amendment criteria. GDPM conducted the required public comment process, including:

- Publication of the proposed amendment on GDPM's website for not less than 45 days
- Public hearing held in the City of Dayton, Ohio
- Review and consideration of all public comments received
- Board of Housing Commissioners approval

14.3 Future Amendments

Any material change to this policy – including changes to the lottery methodology, the addition or elimination of local preferences, or the structure of the Waiting List – shall be processed as a Significant Amendment to the ACOP and PHA Plan, subject to public notice, public comment, and

Board approval. Technical, non-substantive amendments may be adopted as administrative updates approved by the CEO and reflected in the ACOP.

SECTION 15: EFFECTIVE DATE AND TRANSITION PROVISIONS

15.1 Effective Date

This policy is effective as of [INSERT EFFECTIVE DATE], following Board of Housing Commissioners approval on [INSERT BOARD APPROVAL DATE].

15.2 Transition from Prior Waiting Lists

On the effective date of this policy, GDPM shall take the following steps to transition from any prior site-based or development-specific waiting lists to the new jurisdiction-wide Waiting List:

1. All current applicants on GDPM's existing public housing waiting list(s) shall be automatically transferred to the jurisdiction-wide Waiting List. No applicant shall be required to re-apply as a condition of being included in the jurisdiction-wide Waiting List.
2. Applicants transferred from existing lists shall receive written notice of the transition, their placement on the new Waiting List, and an explanation of the new random selection lottery procedure.
3. GDPM shall conduct a lottery to assign random ranks to all transferred applicants, placing them on the new jurisdiction-wide Waiting List. To the extent practicable, GDPM shall preserve the relative order of existing applicants within their applicable preference tiers.
4. The transition lottery shall be conducted in accordance with the procedures in Section 6.2 of this policy and shall be fully documented.
5. Any applicant who was on a prior GDPM public housing waiting list and was not transferred shall be entitled to request reinstatement by contacting GDPM within sixty (60) calendar days of the transition notice.

15.3 RAD/PBV Conversions

As GDPM continues to convert public housing units through the Rental Assistance Demonstration (RAD) program to Project-Based Vouchers (PBV), affected Waiting List applicants shall be offered the opportunity to transfer their application to the applicable PBV waiting list administered under GDPM's Administrative Plan, consistent with HUD RAD Notice requirements. Applicants who prefer to remain on the public housing Waiting List may do so if public housing units remain available under GDPM's management.

SECTION 16: CROSS-REFERENCE TO RELATED ACOP PROVISIONS

This policy should be read in conjunction with the following chapters of the GDPM ACOP:

Chapter 1	Overview of the Program and Plan
Chapter 2	Fair Housing, Equal Opportunity, and Violence Against Women Act
Chapter 3	Eligibility – Income Limits, Citizenship, Criminal History Screening
Chapter 5	Occupancy Standards and Unit Offers – Bedroom Size Criteria
Chapter 7	Verifications – Income, Preference, and Eligibility Documentation
Chapter 12	Transfer Policy – Resident Transfers That Precede Waiting List Selection
Chapter 14	Grievances and Appeals – Informal Review Rights for Applicants
Chapter 15	Program Integrity – Anti-Fraud and Documentation Requirements

SECTION 17: KEY REGULATORY AND GUIDANCE REFERENCES

Citation	Subject Matter
24 CFR Part 960	Admission to, and Occupancy of, Public Housing – General
24 CFR § 960.202	Income Eligibility and Targeting (40% ELI requirement)
24 CFR § 960.203	Tenant Screening Criteria
24 CFR § 960.204	Mandatory Denial of Admission (Criminal History)
24 CFR § 960.206	Local Preferences in Admission
24 CFR § 903.7(b)	PHA Plan – Waiting List and Admission Policy Requirements
24 CFR Part 903	PHA Plans – Agency Plan Submission and Amendment
24 CFR § 8.27	Section 504 – Occupancy of Accessible Units
24 CFR § 5.216	Social Security Number Disclosure Requirements
24 CFR § 5.105(a)	Civil Rights and Nondiscrimination Requirements
24 CFR § 982.205(a)(2)	Cross-listing on HCV and Public Housing Waiting Lists
PIH Notice 2012-34	Waiting List Administration for Public Housing and HCV Programs
HUD PHOG (2024)	Public Housing Occupancy Guidebook – Waiting List and Tenant Selection Chapter
42 U.S.C. § 1437n	Income Mixing in Public Housing – Statutory Authority

ADOPTION AND CERTIFICATION

This policy amendment to Chapter 4 of the Greater Dayton Premier Management Admissions and Continued Occupancy Policy was duly approved by the GDPM Board of Housing Commissioners at a public meeting held on [INSERT DATE], having been made available for public review and comment for not less than 45 days prior to adoption, with a public hearing held on [INSERT HEARING DATE].

Jennifer N. Heapy, Chief Executive Officer
Greater Dayton Premier Management

Chairperson, Board of Housing Commissioners
Greater Dayton Premier Management

Date

Date

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