

EXHIBIT 4-1: Application Process and the GHA's Use of the Centralized Housing Choice Voucher Waiting List
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I. INTRODUCTION

The Greenfield Housing Authority (GHA) has elected to utilize the Centralized Application and Waiting List process. The Department of Housing and Urban Development (HUD) has encouraged the use of a Centralized Waiting List by Public Housing Authorities (PHAs). In the Commonwealth of Massachusetts, the PHA Centralized Waiting list is administered by the Massachusetts Chapter of the National Association of Housing and Redevelopment Officials (MassNAHRO) and its subcontractor AffordableHousing.com (formerly "GoSection8."). In doing so the GHA joins over 100 PHAs in Massachusetts.

The use of a Centralized Section 8 Housing Choice Voucher (HCV) Waiting List affords the GHA and its clients the following benefits:

- A) Ease of application process for applicants who may apply at the office of any Housing Authority participating in the Centralized Waiting List option or online at <https://www.affordablehousing.com/masscwl>.
- B) Elimination of the procedural hardship on families and administrative burden to the Housing Authority of closing and opening of the Section 8 HCV Waiting List. The Centralized Section 8 HCV Waiting List is maintained as an open waiting list.
- C) Increase of housing opportunities for families who now have the option of placement at a number of locations throughout the Commonwealth through the submission of a single Preliminary Application.

II. OPENING AND CLOSING OF THE WAITING LIST AND MARKETING

The Centralized Waiting List was opened in January of 2003 and at that time notice of the opening of the Waiting List was published in a local newspaper of general circulation as well as within minority media.

The list has remained open since that date. As individual PHAs join the Centralized Waiting List the individual PHA gives notice by publication in a local newspaper of general circulation and also by minority media and/or other suitable means. Thee GHA has joined the Centralized Waiting List.

Ongoing marketing of the Section 8 HCV Program to those least likely to apply is a combined effort between the participating PHAs, MassNAHRO and AffordableHousing.com. Specifically, publication of the initial participation in the Centralized Waiting List is the responsibility of the PHA. AffordableHousing.com. maintains an up to date website which includes the following information: a description of the Centralized Waiting List and how it operates; a list of participating PHAs; instructions as to how to apply; program eligibility information; the online

Preliminary Application and printable paper Preliminary Application which are available in multiple languages; manner in which to perform a status check and modify a Preliminary Application as well as responses to frequently asked questions.

Further AffordableHousing.com performs outreach and education to advocates and community service agencies by providing free training sessions as to the application process. In addition, AffordableHousing.com provides informational postcards as to the application process and where to obtain additional information as well as toll-free live telephone support.

Individual PHAs and/or other parties as applicable may also perform marketing on an as needed basis with regard to their specific programs.

III. ACCEPTANCE OF APPLICATIONS

A single, standardized Preliminary Application is available at each participating Housing Authority and online at <https://www.affordablehousing.com/masscwl> . A master list of all participating PHAs is maintained at the office of MassNAHRO, at each participating Housing Authority and online at <https://www.affordablehousing.com/masscwl> . Only one Preliminary Application is accepted for each Family¹.

The Preliminary Application requests information as required to administer the Section 8 HCV Program such as: name and city or town (where Head of Household and spouse/partner live and work), telephone number, total number of family members, Head of Household's social security number, if client is 62 years of age or older or disabled, total gross family income, race, and ethnicity. Information regarding preferences adopted by participating Housing Authorities is also elicited on this Preliminary Application.

MassNAHRO reserves the right to modify the Preliminary Application to change or include other information required or useful to administer the Section 8 HCV Program.

Preliminary Applications are available for completion at the GHA Office in person between the hours of 8:00 am to 12:00 pm and 1:00 pm to 4:00 pm, Monday, Tuesday, Thursday, Friday, and 8:00 am to 1:00 pm on Wednesday. Blank Preliminary Applications may be mailed or faxed to a family by a Participating PHA for completion by the family.

Upon completion of the Preliminary Application it shall be marked by the PHA staff with date and the time of submission and the family shall be provided with a standard receipt evidencing submission of the Preliminary Application. The GHA will then enter the information from the Preliminary Application into the Centralized Waiting List.

¹ There is an exception when an application has been rejected by a participating PHA for a reason which may not make the family ineligible at another participating PHA. The family may then reapply to the PHA where the application was rejected to be placed on the Waiting List for that participating PHA according to a new date and time. The original application will remain in the system for all other PHAs where the family could potentially be eligible.

Preliminary Applications may also be submitted online anytime at <https://www.affordablehousing.com/masscwl> at which time an on line receipt is generated.

Families are notified at time of application that PHA's may have open waiting lists for the public housing program, project-based voucher program or moderate rehabilitation program and often other State funded programs and if the other program includes units suitable for the applicant, the family should contact the PHA directly for placement its waiting list for the other program(s). Information as to availability of many of these program(s) is on line on the website. Upon completion of a Preliminary Application, if there is another open waitlist the for any other program administered by any participating PHA for which applicant may be eligible which is operated through Gosection8.com, the family will receive automatic notification on the website and by email and may elect to apply instantly online. In this instance there is no need to fill out an additional Preliminary Application.

IV. UPDATING THE APPLICATIONS

A family may update its Preliminary Application (i.e. change of address) for Section 8 HCV Assistance online at <https://www.affordablehousing.com/masscwl> or at the office of any PHA participating in the Centralized Waiting List Application process regardless of where the original Preliminary Application was submitted. To update the Preliminary Application through a PHA, a written request must be submitted to the PHA by the family.

In the event of a family break up into two otherwise eligible families, only one family will retain the original Preliminary Application. The second family may submit a new Preliminary Application for assistance which will have a new date and time.

In the absence of a judicial determination with regard to who should retain the original application, the family will generally determine who retains the original Preliminary Application. The PHA will allow the Head of Household to report who remains on the original Preliminary Application to reflect this family decision. However, if MassNAHRO or the PHA is informed that the matter is in dispute they shall make the decision as to who will retain the original Preliminary Application taking into consideration the following factors: (1) The interest of minor children including custody arrangements. (2) The interest of ill, elderly, or disabled family members. (3) The interest of a victim of an occurrence of domestic violence, dating violence, sexual assault, or stalking². (4) The relevant recommendations of social service professionals involved with the family. (5) The Head of Household who is listed on the original application.

V. SELECTION FROM THE WAITING LIST

Except for special admissions (See 24 CFR 982.203 (2018)), HCV participants will be selected from the Waiting List. The selection criteria set forth in the GHA's Administrative Plan shall govern the manner in which individuals and families are selected by the GHA from the Centralized Section 8 HCV Waiting List. Further, when HUD awards a Housing Authority program funding for a specified category of families on the Waiting List (See 24 CFR 982.204

² To the extent that the provisions set forth in 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking apply the GHA will adhere to such requirements.

(e) (2018)), the PHA must select applicant families in the specified category. This is further described in the GHA's Administrative Plan, HUD award and/or Notice of Funding Availability for said funding.

GHA policies which dictate the order of selection are described within Chapter 4 of the GHA's Section 8 HCV Administrative Plan.

Pursuant to 24 CFR 982.201(b)(2) (2018), not less than 75 percent of the families admitted to a PHA's HCV program (tenant based and project based where applicable) during the PHA fiscal year from the PHA waiting list shall be extremely low income families. The PHA may skip a family with an income above the extremely low income limit on the waiting list in order to select an extremely low income family to meet this requirement.

VI. DETERMINATION OF ELIGIBILITY

Once a family has been selected from the Centralized Section 8 HCV Waiting List in the manner set forth in the GHA's Administrative Plan, eligibility determination shall be made according to federal law, regulations governing State law and any applicable procedures set forth in the GHA's Administrative Plan.

VII. DETERMINATION OF INELIGIBILITY

If a family is denied assistance by the GHA, they have the right to the appeal the denial using procedures set forth in the GHA's Administrative Plan and federal regulations³.

The removal from the list shall not occur until the appeal procedure when requested or time period for the family to request this appeal has expired. Appeal rights and procedures are governed by the applicable code of federal regulations and the contents of the Administrative Plan. Further, to the extent that a denial is based upon CORI or Immigration Status information, regulations and GHA Plan procedures governing denials on such basis including any appeal rights related thereto shall apply.

Ineligibility for Assistance Based upon PHA Policy - Removal from the Centralized Waiting List for a Particular PHA Only

If the family could be eligible under another participating PHA's policies, the family's name will not be removed by the GHA from the Centralized Section 8 HCV Waiting List. However, the family will not again be selected by the GHA unless a new Preliminary Application has been submitted to the GHA.

Certain items which are considered mandatory denial categories still result within a removal from the particular PHA's list only because there is some component of that PHA Policy associated with such denial (i.e. the family does not qualify on the basis of citizenship or the eligible immigrant status of family members as required in 24 CFR Part 5 Subpart E, Restrictions on

³ Informal Review or Informal Hearing, as applicable

Assistance to Noncitizens insofar as PHAs may *elect* to require documentation to verify Citizenship or when the family does not meet the Social Security Number disclosure and documentation requirements as set forth in 24 CFR 5.216 insofar as for pending disclosure and documentation of social security numbers, the PHA may allow the family to retain its place on the Waiting List for differing times based upon PHA policy.)

Mandatory Ineligibility for Assistance - Removal from Centralized Waiting List for All PHAs

If the family is removed from the Waiting List because it is deemed ineligible for a reason which is mandatory the name shall be removed from the Waiting List for all PHAs. Mandatory grounds for all PHAs are as follows:

- The family fails to sign and submit the consent forms for obtaining information in accordance with 24 CFR 5, Subparts B and F [24 CFR 982.552(b)(3)].
- Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing as set forth in 24 CFR 982.553 (a) (1) (ii) (C) (i).
- Any household member is subject to a lifetime registration requirement under a state sex offender registration program as set forth in 982.553 (a) (2) (i).

Mandatory Ineligibility for Assistance due to Income Limits - Removal from Centralized Waiting List Dependent on Location for Income Limit Determination

When the family's income limit exceeds that required for participation in the HCV program pursuant to 24 CFR 982.201 they shall be denied participation in the HCV program. If the family is denied participation in the HCV Program because it is over the applicable income limits for the program, the family's name will be removed only from the Centralized Section 8 HCV Waiting List for the Housing Authority making the determination and all other PHA's in the area with income limits at or below the level of the PHA making the determination. The family's name shall remain on the list for other participating PHAs in areas with income limits above that of the PHA making the denial. If the family later reapplies it shall be provided with a new (later) Preliminary Application date for the PHAs from which the family's name was previously removed due to the over income denial.

PHA's which have adopted specific policies to admit a low-income family that meets additional eligibility criteria specified in that PHA's Administrative Plan which could impact their particular PHA income limits will notify GoSection8 to make certain a different level should not be on file for the particular PHA in relation to denials under this section.

VIII. NO RESPONSE TO PHA- REMOVAL FROM CENTRALIZED WAITING LIST FOR A PARTICULAR PHA ONLY

If the family does not respond to a letter sent by a participating Housing Authority to attend an eligibility determination appointment or to otherwise respond to the Housing Authority, the

Housing Authority who requested said response may remove the family's name from the Centralized Section 8 HCV Waiting List for their particular PHA only. The manner for said removal and any applicable appeal procedure shall be governed by the Administrative Plan for the Housing Authority making said removal.

The family's name can not be removed by the GHA from the entire Centralized Section 8 HCV Waiting List. However, the family will not again be selected by the GHA unless a new Preliminary Application has been submitted to the Greenfield Housing Authority.

IX. WAITING LIST UPDATES; PURGING OF WAITING LIST

While the family is on the waiting list, within 10 business days of the occurrence of a change, the family must inform the PHA of changes in contact information (including current residence, mailing address and phone number) household composition, preferences and total household income. The changes must be submitted in writing to a participating PHA or on line via the GoSection 8 application portal within 10 business days of said change.

In order to make certain the Waiting List remains up to date AffordableHousing.com will send e-mail reminders for families to keep their mailing addresses up to date. Families may also elect to receive optional text reminders.

MassNAHRO will, on a biennial basis, send a letter to each applicant on the Centralized Section 8 HCV Waiting List. This letter will be sent to the address on the Section 8 HCV Preliminary Application or on any written change of status request that was completed and sent to a participating Housing Authority. Applicants will be requested to respond to the mailing, either online at <https://www.affordablehousing.com/masscwl> or by mailing back the response card, within a time parameter set forth in the letter and the letter shall indicate that failure to respond will result in the removal of his/her name from the Centralized Section 8 HCV Waiting List. In the event that the applicant does not respond within the applicable time parameter, his/her name shall be removed from the Centralized Section 8 HCV Waiting List.

Applicants removed by MassNAHRO due to no response to the update mailing may appeal to MassNAHRO during the posted reinstatement period. After the reinstatement period MassNAHRO will consider appeals that are requested as a reasonable accommodation for a person with a disability.

X. JURISDICTION REGARDING CERTAIN DECISIONS

When a family expresses a problem with a decision made by a PHA involved in the Centralized Section 8 HCV Waiting List, that family shall be referred to the PHA who made the determination in question. This includes when a family is removed from the Centralized Waiting List for failure to reply to the PHA.

When a family expresses a problem with a decision made by MassNAHRO, that family shall be instructed to send a written request for reinstatement along with supporting documentation to MassNAHRO's Centralized Waiting List Administrator at: Massachusetts Centralized Waiting

List, PO Box 308, Dedham, MA 02027.

XI. NONDISCRIMINATION AND PROGRAM ACCESSABILITY

Preliminary Applications will be accepted without regard to race, color, sex, religion, familial status, age, disability, national origin, marital status, gender identity, sexual orientation, receipt of public assistance or housing subsidies, ancestry, military or veteran status, or genetic information.

PHA's will provide reasonable accommodations as required under the law to assist individuals with disabilities. Upon request, this may include provision of appropriate auxiliary aids and services necessary to ensure effective communication *e.g.*, Braille, audio, large type, assistive listening devices, and sign language interpreters. Reasonable accommodations may also include a change in policy or procedure to make the program accessible. Such requests will be considered and made as required according to applicable law. Applicants are advised of their right to request a reasonable accommodations both on the website and the hard copy of the Preliminary Application.

Persons with hearing and/or speech impairments may access the AffordableHousing.com telephone number via text telephone (TTY) using Massachusetts Relay at 711 for English and (866) 930-9252 for Spanish.

PHAs, MassNAHRO and GoSection8 will take reasonable steps to ensure meaningful access by persons with limited English proficiency (LEP). Such steps will include translation of common written materials into those languages frequently spoken by Applicants. Further on an as needed basis AffordableHousing.com or the participating PHA (depending upon the point of contact) may arrange for telephonic or in person interpretation. The on line Preliminary Applications queries the "preferred language" and once selected the computerized Preliminary Applications process is in that language. There are multiple languages on the site which are those most commonly encountered in Massachusetts with regard to LEP individuals. AffordableHousing.com has bilingual staff that speak English, Spanish, French and Hattian Creole. Further, telephonic interpretation is available in any other needed languages.

XII. CONFLICT AND GRANT OF AUTHORITY

To the extent that the contents of this Exhibit conflicts with the PHA's Section 8 HCV Administrative Plan with regard to waiting list administration, the GHA Plan shall prevail. The GHA Executive Director, MassNAHRO and AffordableHousing.com are authorized by the Board of Commissioners to modify and implement procedures to meet the requirements of this program. The GHA Executive Director, MassNAHRO and AffordableHousing.com are further authorized by the Board of Commissioners to institute other changes provided those changes are consistent with the authorizations granted herein.

