



Resident Selection Plan & Occupancy Standards (Effective 05/31/2024)

Kavod Senior Life (Kavod) provides 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. Social Security Number Disclosure Requirements.

2.1. All household members receiving HUD housing assistance or applying to receive HUD housing assistance are required to provide a Social Security Number and adequate documentation necessary to verify that number.

This rule applies to all household members including live-in aides, foster children and foster adults. Adequate documentation includes a Social Security card issued by the Social Security Administration (SSA) or other acceptable evidence of the SSN such as:

- Original Social Security card;
- Driver's license with SSN;
- Identification card issued by a federal, State, or local agency, a medical insurance provider, or an employer or trade union;



- Earnings statements on payroll stubs;
- Bank statement;
- Form 1099;
- Benefit award letter;
- Retirement benefit letter;
- Life insurance policy;
- Court records.

If the applicant cannot provide any of the above, the applicant will advise the owner/agent. The owner/agent may accept self-certification of SSN and at least one third-party document, such as a bank statement, utility or cell phone bill, benefit letter, etc., that contains the name of the individual. When none of the other accepted methods is available and if verifying an individual's SSN using this method, the owner/agent must document why the other SSN documentation was not available. If the resident's SSN becomes verified in EIV, then no further verification is required. If the resident's SSN fails the SSA identity match, then the owner/agent must obtain a valid SSN card issued by the SSA or an original document issued by a federal or state government agency that contains the name of the individual and the SSN of the individual, along with other identifying information of the individual. The resident family's assistance must be terminated if they fail to provide the required documentation.

2.2. Exceptions to Disclosure of Social Security Number

The Social Security Number requirements do not apply to:

- Individuals age 62 or older as of January 31, 2010, whose initial determination of eligibility began before January 31, 2010.
- Individuals who do not contend eligible immigration status.
- A child under the age of 6 years added to the applicant family within the 6-month period prior to the household's date of admission. The household will have a maximum of 90-days after the date of admission to provide the Social Security Number and adequate documentation that the Social Security Number is valid. An additional 90 days may be granted under certain circumstances. If the household does not provide the Social Security Number and adequate documentation to verify the Social Security Number within the prescribed timeframe, HUD requires that the owner/agent terminate tenancy.
- A minor under the age of 6 years being added to the household after move-in. The household will have a maximum of 90-days after adding the child to provide the Social Security Number and adequate documentation that the Social Security Number is valid. An additional 90 days may be granted under certain circumstances. If the household does not provide the Social Security Number and adequate documentation to verify the Social Security Number within the prescribed timeframe, HUD requires that the owner/agent terminate tenancy.
- Foster children or adults when: - The foster agency will not provide the SSN or adequate documentation to verify the SSN; - and HUD approves.

If, at the time a unit becomes available, all non-exempt household members have not provided adequate documentation necessary to verify Social Security Numbers, the next eligible applicant family must be offered the available unit.

All non-exempt household members have ninety (90) days-from the date they are first notified that a unit is available-to provide documentation necessary to verify the Social Security Numbers. During this 90-day period, the household may retain its place on the waiting list but will not be considered again until the required documentation is provided.

If, after ninety (90) days, the applicant family is unable to disclose/verify the Social Security Numbers of all non-exempt household members, the household will be determined ineligible and removed from the waiting list.

The applicant family may apply again, after obtaining the appropriate documentation. The applicant family will be placed on the waiting list based on the date and time the new Application is received.

2.3. Secondary Verification of the Social Security Number

The Social Security Number provided will be compared to the information recorded in the Social Security Administration database through HUD's Enterprise Income Verification System (EIV) to ensure that the Social Security Number, birth date and last name match.

If EIV returns an error that cannot be explained or resolved, assistance and/or tenancy may be terminated and any improper payment must be returned to HUD.

If an applicant/resident deliberately provides an inaccurate Social Security Number, the owner/agent and/or HUD may pursue additional penalties due to attempted fraud.

3. Consent and Verification Forms

Currently, all adult applicants must sign HUD's 9887 and 9887A before being admitted to the housing program and at each Annual Recertification.

Note: The following rules about consent forms require HUD to release an updated 9887.

Starting the later of January 1, 2024 or when HUD releases an updated 9887, all applicants must sign HUD's consent forms at admission. After an applicant or resident has signed and submitted a consent form either on or after January 1, 2024, they do not need to sign and submit subsequent consent forms except under the following circumstances:

- When a new member is added to the unit if: the new member is 18 years of age or older, or the new member is the HOH, co-HOH/spouse regardless of age;
- When a member of the family turns 18 years of age; and
- As required by HUD in administrative instructions.

These consent forms contain provisions authorizing HUD and owner/agent to obtain necessary information for verification of an application or to maintain a family's assistance, including income information and tax return information. The executed consent forms will remain effective until the family is denied assistance, or the assistance is terminated. If a family leaves a HUD program (moves-

out), the family's assistance is considered to be terminated and the signed consent forms will no longer be in effect.

Any adult member of the family may provide written notification to the owner/agent to revoke consent. Doing so makes the family ineligible and housing assistance will be terminated immediately. Termination will be completed in accordance with the HUD lease and HUD guidance. The resident will be provided with a 30-Day Notice of Rent Increase as required.

If, subsequently, the family wishes to reapply for assistance, and when such assistance is available, the HOH, co-HOH/spouse and all adult members will be required to submit the signed 9887 documents with any documentation required to determine eligibility. Failure to do so will result in denial of assistance under HUD's program rules.

When a minor living in the unit turns 18, he/she will have thirty (30) days to meet with the management staff and sign appropriate forms. Failure to do so will result in termination of assistance for the entire household.

4. The unit for which the household is applying for assistance must be the household's only residence.

5. Section 8 Asset Restrictions

The following Section 8 Asset Restrictions are considered when determining eligibility of families applying for Section 8 Housing Assistance: Asset Restrictions apply only to families applying for Section 8 Assistance. This rule does not apply to existing residents currently receiving Section 8 assistance until next annual recertification and software update.

5.1. Home Ownership- Real Property Rule

The Housing Opportunities Through Modernization Act (HOTMA) provides that families cannot receive assistance if they have a present ownership interest in, legal right to reside in, and the effective legal authority to sell real property that is suitable for occupancy as a residence and that is located in the jurisdiction in which the property is located. This includes, but is not limited to a home, condominium, townhome, duplex, mobile home, etc. This restriction does not apply if:

- The property is jointly owned by a member of the family and at least one non-household member who does not live with the family, if the person resides in the jointly owned property;
- The property is not large enough for the size of the family ;
- If there are any disabled family members, the home does not provide for the disability-related needs. (e.g., physical accessibility requirements, disability-related need for additional bedrooms, proximity to accessible transportation, etc.);
- The property is currently offered for sale. Under this proposed rule, in order to demonstrate that a family is offering property for sale, the owner/agent may require that the family provide evidence that the property has been listed for sale;

- The property is considered unsafe to reside in when the property's physical condition poses a risk to the family's health and safety and the condition of the property cannot be easily remedied;
- The family may not reside in the property under State or local laws of the jurisdiction where the property is located;
- The property is owned by a survivor of a VAWA crime (domestic violence, dating violence, sexual assault, stalking) and such status prevents access to or use of the home or is there a possibility that the survivor could be in imminent danger if the survivor attempted to access the home;
- The property is located so that the distance or commuting time between the property and the family's place of work or a family member's educational institution would create a hardship for the family? (e.g., the distance or commuting time between the property and the family's place of work or school would be a hardship to the family, as determined by the owner/agent);
- The property is a manufactured home for which the family is receiving Section 8 tenant-based assistance;
- The family receives homeownership assistance from a PHA;
- The property part of an irrevocable trust.

5.2. Restrictions Based on Net Assets- Assets Cap

A dwelling unit may not be rented, and assistance may not be provided, either initially or upon reexamination of family income, to any family if the net family assets (as defined in § 5.603) exceed the current Asset Cap established by HUD - \$100,000.00 in 2024 (certain assets are excluded). This "cap" may be adjusted annually in accordance with a commonly recognized inflationary index, as determined by HUD.

The following assets will be excluded from the calculation when determining the net cash value of assets. The cash value of:

- ABLE Account;
- Amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty that resulted in a member of the family being disabled;
- Value of any Coverdell Education Savings Account or any qualified tuition program under Section 529;
- Family Self Sufficiency (FSS) Accounts;
- Interest in Indian trust land;
- Irrevocable Trust;
- Necessary Personal Property;
- Non-necessary Personal Property as long as the net cash value of all Non-necessary Personal Property does not exceed HUD's Asset Threshold (\$50,000 in 2024 but subject to annual adjustment);
- Revocable Trusts when no one in the family (living in the unit) controls the trust;
- Retirement Accounts as defined by the IRS;
- Real property when the family does not have legal authority to sell such property;
- Equity in property for which a family receives HCV homeownership assistance from a PHA;

- Equity in a manufactured home where the family receives Section 8 tenant-based assistance;
- Other assets as announced by HUD through Federal Register Notice.

An applicant must agree to pay the rent required by the program under which the applicant will receive assistance. Kavod will use a Mean-tested verification method when software is updated.

5.2 Verification

The owner/agent shall obtain verifications in compliance with requirements set forth by the Department of Housing and Urban Development. After the preliminary eligibility determination, no decision to approve an application shall be made until information provided on the application form and during subsequent interviews has been collected and any necessary follow-up interviews have been performed.

All information relative to the following items must be verified as described in these procedures.

5.2.1. Methods of Verification

Verifications will be attempted as follows:

- a) Means-tested Verification (also known as Safe Harbor). When verifying income at Move-in/Initial Certification, Annual Recertification and Interim Recertification, the owner/agent may determine a family's annual income, including income from assets, prior to the application of any deductions based on income determinations made within the previous 12-month period, using income determinations from the sources related to housing.

The Means-tested verification must state the family size, must be for the entire family (i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for non-family members), and must state the amount of the family's Annual Income. The Annual Income need not be broken down by family member or income type.

Annual income includes income earned from assets, therefore when using Means-tested Verification (also known as Safe Harbor) to verify a family's income, the owner/agent will not inquire about a family's net family assets, nor about the income earned from those assets. For any applicants applying for HUD's Section 8 assistance, the owner/agent will confirm that:

- The net cash value of all family assets does not exceed HUD's current Asset Cap; and
- That no member of the applicant's family owns real property suitable for occupancy (See the explanation of the Real Property Rule as explained in this document).

The Means-tested Verification (Safe Harbor) must show that the family's income determination was made within the 12 months prior to the receipt of the verification by the owner/agent. The Means-tested Verification (also known as Safe Harbor) documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by the owner/agent.

- Income determination effective date;
- Program administrator's signature date;
- Family's signature date;

- Report effective date; or
- Other report-specific dates that verify the income determination date.

The only information that owner/agents are permitted to use to determine income under this Means-tested Verification (also known as Safe Harbor) is the total income determination made by the federal means-test program administrator. Other federal programs may provide additional information about income inclusions and exclusions in their documentation; however, these determinations and any other information will not be considered by the owner/agent for purposes of the Means-tested Verification (also known as Safe Harbor) provision. Owner/agents are not permitted to mix and match Safe Harbor income determinations and other income verifications.

The owner/agent will not use Means-tested Verification (Safe Harbor) when:

- The family wishes to use a Childcare Deduction when childcare enables a member to work;
- The family wishes to use the Attendant Care & Auxiliary Apparatus Expense Deduction;
- Any member of the family is participating in HUD's Family Self-Sufficiency (FSS) program.

b) Upfront Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system (EIV may be used as the sole verification of Social Security income);

c) Upfront Income Verification (UIV) using non-EIV resources (e.g., Work Number, web-based state benefits system, etc.);

d) Written, third-party verification from the source, also known as "tenant-provided verification". An original or authentic document generated by a third-party source dated within 120 days of the date received by the owner/agent. (e.g., resident provided bank statement). For fixed-income sources, a statement for the appropriate benefit year is acceptable documentation. Owner/agents will also accept third-party verification directly from the verification source. For example, owner/agents may obtain verification of disability directly from a medical care provider (e.g., physician, physical therapist, etc.) or may accept a letter provided by the provider to the resident;

e) EIV with Self-Certification (Employment or Unemployment Income). The EIV Income Report may be used to verify and calculate income if the family self-certifies that the amount is accurate and representative of current income. The family will be provided with the information from EIV.

f) A Written Third-party Verification Form (as appropriate);

g) Oral verification. When verifying information over the telephone or via the internet, it is important to be certain that the person is the party he or she claims to be. When verifying information by phone, the owner must record and include in the tenant's file the following information:

- Third-party's name, position, and contact information;
 - Information reported by the third party;
 - Name of the person who conducted the telephone/internet interview; and
 - Date and time of the call.
- h) Family Self-Certification. In the absence of any of the above or as provided in HUD guidance, notarized or witnessed self-certification from the household member (the owner/agent is not required to accept family/self-certification). Except when accepted based on HUD guidance (e.g., Streamlining, Assets Disposed, etc.), when the owner/agent accepts Family Self-Certification, the tenant file will be documented, when appropriate, to show that staff attempted other acceptable verification before relying on family self-certification.

5.3. Streamlined Determination of Income, Streamlined Verification of Assets & Streamlined Certification for Fixed Income Families

Kavod has implemented the following Streamlining processes.

5.3.1. Streamlined Determination of Fixed Income. At move-in and at least every three years, owner/agents will verify income from any fixed income source using verification methods described above. In Year 2 and in Year 3, owner/agents will apply any published/documented COLA or Fixed Percentage Increase to the previous year's fixed income amount.

Streamlined Verification of Assets When the Net Cash Value of Assets Is At Or Below The Current Asset Threshold Established By HUD (\$50,000 in 2024 But Subject To Annual Adjustment by HUD). At move-in and at least every three years, owner/agents will verify the cash value of assets that are not specifically excluded, and will verify the income from those assets when possible. In Year 2 and in Year 3, owner/agents will conduct such verification only if the net cash value of all family assets exceeds the current Asset Threshold. If the net cash value of all family assets (except those specifically excluded), is equal to or less than the current Asset Threshold, the owner/agent will accept the family's notarized or witnessed self-certification providing the net cash value of assets not specifically excluded and any known income from those assets. The owner/agent will accept Self-certification of Assets at move-in as long as the net cash value of assets is \$50,000 or less and the resident also provides anticipated income for those assets.

5.3.2. Streamlined Certification for Fixed Income Families. When 90% or more of the total annual income is derived from a fixed income source (e.g., Social Security, Pension, Annuity), at move-in and at least every three years, owner/agents will verify the cash value of assets that are not specifically excluded, any fixed income amounts and the amount of any income that is not fixed. In Year 2 and in Year 3, the owner/agent will apply Streamlined Determination of Fixed Income and Streamlined Verification of Assets. The owner/agent will also accept self-certification of amounts that are not fixed or the owner/agent will use the amount of income that is not fixed on the most recent 50059 in effect at the time of any certification interview.

Streamlining will not be utilized if any member of the family has received a lease violation for failing to fully and accurately report income information or if any member of the family has been required to return an improper payment to the Department of Housing & Urban Development.

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.

6.1. A student who is otherwise eligible and meets screening requirements is eligible for assistance if the student meets the criteria indicated below. Section 8 assistance shall be provided to any individual who 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; when the student:

- Is living with his or her parents who are receiving Section 8 assistance;
- Is individually eligible to receive Section 8 assistance and has parents who are income eligible to receive Section 8 assistance;
- Is a graduate or professional student;
- Is a veteran of the United States military or is an active member of the United States military;
- Is married;
- Has a dependent other than a spouse (e.g., dependent child);
- Is at least 24 years of age;
- Is a person with disabilities, as such term is defined in section 3(b)(3)(E) of the 1937 Act and was receiving assistance under section 8 of the 1937 Act as of November 30, 2005;
- Is classified as Vulnerable Youth; A student meets HUD's definition of a vulnerable youth when:
 - o The individual is an orphan, in foster care, or a ward of the court or was an orphan, in foster care, or a ward of the court at any time when the individual was 13 years of age or older;
 - o The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's state of legal residence;
 - o The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth (as such terms are defined in section 725 of the McKinney-Vento Homeless Assistance Act) (42 U.S.C. 11431 et seq.), or as unaccompanied, at risk of homelessness, and self-supporting, by:
 - A local educational agency homeless liaison, designated pursuant to the McKinney-Vento Homeless Assistance Act;
 - The director of a program funded under the Runaway and Homeless Youth Act or a designee of the director;
 - The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (relating to emergency shelter grants) or a designee of the director; or

- A financial aid administrator; or
- The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances.

If a student does not meet the eligibility criteria above, but can prove independence from parents under HUD rules, then the student would meet HUD's student eligibility criteria. Please see property staff if you need additional information about proving independence from parents.

If an ineligible student applies for or is a member of an existing household receiving Section 8 assistance, the assistance for the household will not be prorated but will be terminated.

Kavod will not evict or require an ineligible student to move from a unit as long as the student is in compliance with the terms of the lease.

6.2. Prohibition of Assistance to Noncitizen Students

Noncitizen students and their noncitizen families may not receive assistance. Noncitizen students are not eligible for continuation of assistance or temporary deferral of termination of assistance. A noncitizen student is defined as an individual who is as follows:

- A resident of another country to which the individual intends to return;
- A bona fide student pursuing a course of study in the United States; and
- A person admitted to the United States solely for the purpose of pursuing a course of study as indicated on an F-1 or M-1 student visa.

This prohibition applies to the noncitizen student's noncitizen spouse and noncitizen children. However, spouses and children who are U.S. citizens may receive assistance. For example, a family that includes a noncitizen student married to a U.S. citizen is a mixed family.

6.3. Student Financial Assistance

Student financial assistance that is not specifically excluded will be included as part of the family's Annual Income unless the student is the HOH, co-HOH/spouse and is over 23 (24) with a dependent child.

For Section 8 programs, any financial assistance that is provided through a qualified Coverdell Education Savings Account (ESA) or other qualified ESA, is excluded when determining Annual Income for the family.

Any financial assistance a student receives (1) from private sources, (2) from an institution of higher education, or (3) under the Higher Education Act of 1965, that is in excess of amounts received for tuition and other qualified fees, is included when determining Annual Income for the family, except if the student is the HOH, co-HOH or spouse and is at least 24 years of age with a dependent child or children (as defined by HUD).

Student financial assistance that is provided by persons not living in the unit is not part of annual income if the student meets the Department of Education's definition of "vulnerable youth".

Covered fees include tuition, books, supplies (including supplies and equipment to support students with learning disabilities or other disabilities), room and board, and fees required and charged to a student by an institution of higher education (as defined under section 102 of the Higher Education Act of 1965). For a student who is not the Head-of-Household, Co-HOH/Spouse, actual covered costs also include the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit.

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 Household project. The Head of Household must be at least 62 years of age. All information, including age, legal status, identity, and social security number, will be verified and applicant must present supporting documentation.

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) - 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 either a studio or 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. Persons with disabilities 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. 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 may 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 will be scheduled. During the meeting Kavod Care Coordinator will collect vital personal and medical information, provide valuable information about services and assistance they provide to the residents as well as provide them with information on Kavod's available services (housekeeping and laundry services, activities, groups and clubs, volunteer opportunities, etc.) This interview has no effect on someone's eligibility or tenancy.

8. Kavod has a meal program which is part of the lease agreement. It consists of six 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. Applications may be delivered in person, sent by mail or email or faxed.

- Mail or deliver completed application materials to:
Kavod Senior Life
Attn: Leasing Coordinator
22 South Adams Street
Denver, CO 80209
- Email completed applications to Applications@KavodSeniorLife.org
- Fax completed applications to 720-382-7850

2. The application is received by Kavod's Leasing Coordinator and reviewed for completion of all required information.

3. If any item is incomplete, it will be returned with a request for additional information.

4. If complete, the application is stamped with the date and time received and the applicant's name is entered on the bottom of the wait list. If the applicant is requesting residence in our Assisted Living, their completed application will be added to the Assisted Living wait list.

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 ensure compliance with HUD Regulations.

7. Criminal background check, credit 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:

- The applicant or household member is subject to a lifetime registration requirement under a state sex-offender registration program.
- The applicant or household member has been evicted from federally-assisted housing for drug-related criminal activity within five years from the date of admission. This is not a reason for mandatory rejection and the applicant must present mitigating circumstances, including:
 - a) completing a supervised drug or alcohol rehabilitation program or
 - b) the circumstances leading to the eviction no longer exist.

The following conditions would warrant a possible decline for occupancy:

Criminal Background:

- Criminal background check indicates a felony or a drug or alcohol related conviction within the last five (5) years.
- Criminal background check indicates conviction date within the last two (2) years from the date of application for a felony offense.

An arrest is not sufficient evidence of criminal activity and cannot be the sole basis for denial from or termination of tenancy.

Kavod will consider the nature, relevance, and recency of the criminal activity.

Credit Check:

- Any delinquent or charge off debt over \$100 due to other apartment communities.
- Credit history for the last three (3) years will be reviewed.
- Amounts placed for collection totaling \$3,000 or more.
- Amounts placed into charge-offs accounts totaling \$3,000 or more.
- A derogatory credit item(s) within the past three (3) years such as repossessions, foreclosures, judgments, liens and any open bankruptcy.

Negative information will not necessarily result in an applicant family's automatic denial from housing. Kavod will consider the accuracy, nature, relevance, and recency of negative information, and any mitigating or extenuating circumstances before a denial is issued and during any subsequent appeal of a denial. Records that demonstrate that the applicant prevailed against any allegations, or matters were settled without either party admitting fault, will not be used to deny the applicant. Kavod will take reasonable efforts to investigate conflicting information, such as evidence of a criminal record without a conviction date on the screening report.

Pre-Denial Notification: Prior to making a negative eligibility determination, Kavod will notify the applicant of the proposed decision, present a copy of the negative record used to support the proposed decision to the applicant, and provide the applicant the opportunity to dispute the information by providing mitigating circumstances as outlined in previous paragraph or providing information that the record is incorrect. Applicants will be given 10 days from receipt of the pre-denial notification to dispute it. If, within this period of time, Kavod does not receive a response, Kavod shall proceed to the denial process. After considering any materials or information received, Kavod shall have fourteen (14) days to rescind the negative eligibility determination or proceed with denial.

Denials: For all applicants denied, Kavod will continue to transmit written notification to the applicant of the reason for the denial and must include any information relied on to deny the applicant. 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.

Derogatory credit relating to medical expense will not be considered as grounds for declining an applicant.

Landlord Check: Landlord check revealed an eviction within the last five (5) years.

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

- 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 lived with parents, guardians, or other relatives.

- If any household member is currently engaged in illegal drug use.
- 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.
- Applicant(s) cannot have any record of fraud in connection with any housing program, or any willful misrepresentation in this application procedure.

Kavod uses a third party 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.

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.

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.

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.
 - 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.

Kavod will notify the applicant, in writing, of its intention to remove the applicant's name from the list. 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:

- The applicant may tour the facility.
- An interview will be scheduled with the applicant and resident care staff to inform future tenants of available programs and services.
- An account of income, assets, and medical expenses, as well as 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 deposit, 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 (only if No Preference was marked on Application) 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. Kavod wait list tracks data required by HUD and fair housing guidelines.

2. 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 waitlist. The applicant will be required to sign a Lease Addendum that 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.

3. Kavod may close our waitlist if the average wait for an apartment is excessive (e.g., two years 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 waitlist is closed on our website (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 website 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 Olga Roush, Fair Housing Compliance Officer for Kavod. She can be contacted at 22 South Adams Street, Denver, CO 80209 or 303.399.1146.

VI. Requests for Reasonable Accommodation/Modification and Disability Verification

Kavod will seek to identify and eliminate situations or procedures that create a barrier to equal housing opportunity for all. In accordance with Section 504, Kavod will make reasonable accommodations/ modifications for individual's disabilities (applicants and residents). A reasonable accommodation/modification is a change, exception, or adjustment to a program, service, building, dwelling unit, or workplace that will allow a qualified person with a disability to:

- Participate fully in a program.
- Take advantage of a service.
- Live in a dwelling; or
- Perform a job.

A request for reasonable accommodation/modification may include an accommodation or exception to the rules, standards and practices for the development and use of housing or housing-related facilities that would provide a person with a disability with equal opportunity to housing of their choice. A modification is any physical change to a dwelling unit or the public or common use areas of a building necessary to afford that person full enjoyment of the premises or the dwelling.

Kavod provides auxiliary aids to ensure effective communication with visual, hearing- and speech-impaired residents and applicants to give 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).

The obligation of Kavod to make reasonable accommodations/modifications applies only to people who are disabled. The requirement to make reasonable accommodations and reasonable modifications does not apply to the other protected classes.

A person with a disability is a person who can provide verifiable proof that he/she:

- Has a physical or mental impairment that limits or substantially limits one or more major life activities;
- Is regarded as having such impairment; or
- Has a record of such impairment

A request for reasonable accommodation/modification may be made by any person with a disability, or by an entity acting on behalf of a person or person with disabilities to provide or secure equal access to housing, when the application of a zoning law or other land use regulation, policy of practice acts as a barrier to fair housing opportunities.

The resident/applicant with a disability must show that the accommodation/modification they are seeking has an identifiable relationship, or nexus, between the requested accommodation/modification and the individual's disability.

If the disability and need for the requested accommodation/modification are obvious or known to Kavod, Kavod may not ask for any additional information through the Request for Reasonable Accommodation Form and Third Party Accommodations Verification Form about the disability or need for the requested accommodation/modification.

If the resident's/applicant's disability is obvious or known to Kavod but the need for the requested accommodation/modification isn't obvious or otherwise known, Kavod will seek further information to verify that the accommodation/modification is needed because of the disability. If the disability is not obvious, Kavod will verify that he/she is, in fact, disabled and that the accommodation/modification is needed because of the disability.

VII. 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.

Each page of our website has a link at the top to change to the preferred language. Requests can also be made in person at the front desk at 22 S. Adams Street, Denver, CO 80209, where “I speak” cards are available or via email at info@KavodSeniorLife.org or on our website: <https://KavodSeniorLife.org>

VIII. 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.
6. Nonretaliation. Kavod staff will not discriminate against any person because that person has opposed any act or practice made unlawful by the Violence Against Women Act or because that person testified, assisted, or participated in any matter related to the Violence Against Women Act or a VAWA crime.
7. Noncoercion. Kavod staff shall not coerce, intimidate, threaten, or interfere with, or retaliate against, any person in the exercise or enjoyment of, on account of the person having exercised or enjoyed, or on account of the person having aided or encouraged any other person in the exercise or enjoyment of, any rights or protections under the Violence Against Women Act including:
 - Intimidating or threatening any person because that person is assisting or encouraging a person entitled to claim the rights or protections under the Violence Against Women Act.
 - Retaliating against any person because that person has participated in any investigation or action to enforce the Violence Against Women Act.

8. Protection to Report Crimes from Home. Kavod staff, residents, occupants, service providers, guests and applicants:

- Shall have the right to seek law enforcement or emergency assistance on their own behalf or on behalf of another person in need of assistance; and
- Shall not be penalized based on their requests for assistance or based on criminal activity of which they are a victim or otherwise not at fault under statutes, ordinances, regulations, or policies adopted or enforced by covered governmental entities. Prohibited penalties include:
 - o Actual or threatened assessment of monetary or criminal penalties, fines, or fees.
 - o Actual or threatened eviction.
 - o Actual or threatened refusal to rent or renew tenancy.

IX. Occupancy Standards

1. The initial lease term is for one year. A notice to vacate is required to terminate the lease agreement by the resident.

A security deposit is required 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 rent changes. This security deposit is held in an interest bearing account and accrues interest for the resident.

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 checking or savings account.

Applicant and residents must behave in courteous way, be properly dressed, use respectful language, act in business-like manner.

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 at least \$10.00 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 move-in to pet 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. Rent Calculation

The Total Tenant Payment (TTP) will be calculated in compliance with HUD rules. This means that the family will pay the greater of:

- 10% of Monthly Income;
- 30% of Monthly Adjusted Income; or
- Welfare rent (welfare recipients in as-paid localities only); or
- The \$25 minimum rent (Section 8 only).

Kavod is required to ensure that residents pay the correct Tenant Rent based on HUD's requirements.

5. Hardship: In certain situations, Kavod will make a Hardship Exemption related to Minimum Rent (Section 8 only) and/or Annual Deductions.

5.1. Kavod may, at Kavod management's discretion, grant a Hardship Exemption waiving a family's requirement to pay Section 8 Minimum Rent. The owner/agent may also approve a request for a Hardship Exemption related to:

- The Childcare Deduction;
- The Health & Medical Expense Deduction; and/or
- The Attendant Care & Auxiliary Apparatus Deduction.

5.2. The owner/agent will grant a Financial Hardship Exemption (General Relief) if:

- The resident requests a Minimum Rent Hardship Exemption, a Financial Hardship Exemption or a Childcare Hardship Exemption;
- The resident participates in a review meeting;
- The resident provides required information and signatures within ten (10) business days;
- There is an increase to TTP as described below:
- The net Cash Value Of Assets for the entire family is \$50000 or less; and
- The family's total Annual Income is at or below the current Extremely-low Income Limit, and;
- The change results in a TTP that exceeds 20% of the family's Annual Income.
- The resident has not provided Notice to Move;
- The resident is a resident in good standing and the owner/agent has not indicated intent to terminate assistance and/or terminate tenancy (eviction);
- The resident agrees to participate and participates in a review meeting at least every 90 days or upon request by the owner/agent.

5.3. If the Request for the Financial Hardship Exemption (General Relief) is approved, the Health & Medical Expense or Attendant Care & Auxiliary Apparatus Expense will be reduced by 5% of the family's Annual Income instead of reducing the Expense by 10% of the family's Annual Income.

5.4. The Hardship Exemption (General Relief) ends at the earliest of:

- Ninety (90) calendar days from the Effective Date of the Certification implementing the exemption;
- Such time the owner/agent determines the need for the Financial Hardship Exemption no longer exists and the family is able to pay their rent without the Financial Hardship Exemption;
- Assistance is terminated;

- The resident fails to meet with property staff or provide information/signatures, as required, at least every 90 days or upon request from the owner/agent.

5.5. The resident may request and the owner/agent may extend the Financial Hardship Exemption (General Relief), for increments of no more than 90 days. There is no limit to the number of times the Hardship Exemption may be extended.

For additional information related to Hardship Exemptions, please contact the leasing department staff.

6. Reporting Changes Between Annual Recertification (AR)

Resident family composition, income and expenses are reviewed at least annually.

Residents are required to report changes, between Annual Recertification, based on requirements outlined in the HUD Model Lease. Changes that result in an income increase or removal of a member must be reported within 30 days. The addition of a new resident (except minors) must be approved before the new member moves in to the unit. Failure to notify the owner/agent before a new member is added is a material lease violation and will result in termination of tenancy. Addition of new minors must be reported as quickly as possible, but not later than the date the next rent payment, is due after the minor is added.

If the change reported results in a reduction to family income, the owner/agent will process an Interim Recertification (IR), adjusting rent, when that reduction results in a decrease of the family's Annual Adjusted Income of 0% or more.

If the change is not related to earned income, and results in an income increase of the family's Annual Adjusted Income of 10% or more, the owner/agent will complete an Interim Recertification adjusting rent.

If the reported change includes an increase to earned income, but an Interim Recertification reducing earned income has not been completed since the last AR, the owner/agent will document the resident file, but will not recalculate the rent. However, if the IR reducing earned income has been completed since the last AR, the owner/agent will complete an IR adjusting rent. Residents are still required to report within 30 days as required by the lease and the owner/agent's policies.

If the residents comply with reporting requirements, rent changes will be implemented as follows:
Rent increases. If the rent increases, the owner will give the tenant 30 days advance notice of the increase. The effective date of the increase will be the first of the month after the end of the 30-day period.

Rent decreases. If the rent will decrease, the change in rent is effective on the first day of the month after the date of action (e.g., first of the month after the date of loss of employment.) A 30-day notice is not required for rent decreases.

If the residents do not comply with the reporting requirements, and the owner discovers the tenant has failed to report changes as required, the owner will implement rent changes as follows:

- Rent increases. Owners must implement any resulting rent increase retroactive to the first of the month following the date that the action occurred.
- Rent decreases. Any resulting rent decrease must be implemented effective the first rent period following completion of the recertification. The owner/agent will make rent decreases retroactive under certain circumstances.

7. Errors

7.1 Errors Caused by a Member of the Resident Family

If an owner suspects that a resident has inaccurately supplied or misrepresented information that affects the rent or a family's eligibility, the owner must investigate and document the resident's file.

If the resident family meets with the owner to discuss the error, and the owner is convinced the submissions were correct, the owner will document the file accordingly and close the investigation.

If, after meeting with the resident family, the owner determines that the provision of inaccurate information was an unintentional program violation, the owner will correct the rent calculation, if applicable, and provide the tenant with notice of the change in rent. If the resident received an improper payment, the resident will be required to return that improper payments, in compliance with the HUD lease.

If the tenant is unable to repay the full amount, the owner and tenant may enter into a repayment agreement.

If, after the income adjustment, the family no longer qualifies for assistance, the family may remain in the property subject to making repayments and paying market rent.

The owner may terminate tenancy if the resident refuses to pay any new monthly rent or refuses to repay the previously overpaid subsidy (improper payment) pursuant to any Repayment Agreement. The owner may terminate tenancy if the resident refuses to enter in to Repayment Agreement if such an option is offered.

If necessary, civil action may be filed to recover the funds.

If the owner determines the resident knowingly provided inaccurate or incomplete information, and this can be substantiated through documentation, the owner will pursue the incident as fraud.

7.2 Errors Caused by the Owner/Agent, a Service Bureau or Owner/Agent Software

If the owner/agent determines that an error was made and the family's income was over-reported, the owner must complete corrections to the prior certification(s) affected by the income change. Once the corrections have been made, the owner must determine the difference between the amount of rent paid and the rent that should have been paid.

- The owner/agent will request a meeting to discuss the error;
- The owner/agent will prepare corrections or new certifications that must be signed by all adult members;
- The owner/agent will provide the family with written notification, which includes:
 - o A notice of the change in rent, effective retroactively to when the error occurred;
 - o The new monthly rent the tenant is required to pay;
 - o The amount of the overpayment of rent due; and
 - o A form used by the family choosing whether to:
 - Receive a full refund; or
 - Apply the overpayment to future monthly rent payments.

Please note that any credit will be applied to any outstanding rent payment before calculating the amount due to the resident family.

To maintain our property in decent, safe and sanitary condition, all apartments are inspected at least once a year by our Leasing department staff.

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 Fob	\$ 25.00 per card
Automatic Door Opener Replacement	\$150.00 per opener
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



X. Unit Transfers

1. Resident Requests for Unit Transfers: Kavod will accept requests for transfer based on the following:

- A unit transfer because of household size
- A new unit because of changes in household composition
- A deeper subsidy (because subsidy is not attached to the physical unit, this type of transfer is not typically required)
- A unit transfer based on the need for an accessible unit
- A unit transfer for a medical reason certified by a doctor or other medical professional
- A unit transfer from a studio to one bedroom apartment
- 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 a 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 a 30-day 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.

XI. Notification of Policy Changes

30 days written notice will be given if changes made to the Kavod preferences in the Resident Selection Plan & Occupancy Standards.

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