DATE: January 31, 2023

TO: Mayor and Council Members

FROM: Section 8, Housing and Community Development Block Grant Department

SUBJECT: Resolution Adopting the Affordable Housing Waiting List Policy Manual and Authorizing the City Manager or Designee to Amend the Manual

RECOMMENDATION:
It is recommended that the Mayor and Council Members adopt a resolution adopting the Affordable Housing Waiting List Policy Manual and authorizing the City Manager or designee to amend the Manual from, time to time and as necessary, without City Council approval, provided that amendments are reported at the next available City Council Meeting.

BACKGROUND:
The City of Inglewood continues to make progress in achieving its goals to preserve and create more affordable housing. One important component of providing affordable housing is establishing a comprehensive waiting list policy. A waiting list policy provides essential guidelines for waiting list applicants and assists City staff with the waiting list management and referral process.

The City currently incentivizes developers to build affordable housing by offering a Density Bonus and Transit Oriented Developments. According to the City of Inglewood’s Regional Housing Needs Allocation (RHNA), over the next eight (8) years, the City of Inglewood should aim to create approximately 7,439 new affordable housing units to meet its RHNA allocation. In conjunction with the City’s approved Transit Oriented Development (TOD) Plan and the City’s Density Bonus Ordinance (DBO), the City of Inglewood is encouraging development of new affordable housing units throughout the City. This type of inclusionary housing requires the need to establish a waiting list of eligible applicants to fill the below market rate units. Currently, there are approximately forty-two (42) affordable housing units in the construction pipeline that will require referrals to fill those vacancies.

In 2014, the City adopted the Density Bonus Ordinance, which allows for variations in development standards or waivers (e.g., height, stories and parking). A Density Bonus is a local land use policy that links approvals for market rate housing to the creation of affordable homes for low- and moderate-income households (“Inclusionary Housing”). The primary goals of density bonus is to expand the supply of affordable housing and promote social and economic integration. The ability not only to produce affordable homes but also to ensure their long-term affordability, is critical for meeting the housing needs of the lower-income families. Currently, the City approves affordability term of not less than fifty-five (55) years. Also, the City will try to comply
with any affordable housing State law that supersedes or grants waivers/concessions to build affordable housing.

**DISCUSSION:**
Adopting a waiting list policy manual will provide a list of preferences that the City will use for selecting referrals when new Inclusionary Housing developments are constructed in the City of Inglewood.

The City of Inglewood should have policies regarding the waiting list it will use, and how the waiting list will be organized and managed. The policy should include guidelines on notifying the public on the opening and closing of the waiting list to new applicants; updating family information; purging the list of families that are no longer interested in or eligible for affordable housing; and referrals and conducting outreach to ensure a sufficient number of applicants remain on the list.

The proposed Affordable Housing Waiting List Policy Manual will provide guidelines for establishing and maintaining one (1) general affordable housing waiting list for all of the affordable housing developments in the City of Inglewood. The City will make waiting list referrals to developers that build affordable housing within the City of Inglewood. Some of the developments that will receive referrals from the City include, but are not limited to, Density Bonus properties, Inclusionary Housing properties, workforce housing, or other General Affordable Developments. As amended from time to time, the income limits for the general affordable housing waiting list will not exceed the Moderate-income limit, one hundred twenty percent (120%) of the area median income for Los Angeles County as described below:

### 2022 INCOME LIMITS:

<table>
<thead>
<tr>
<th>Household Size</th>
<th>Extremely-Low (30%)</th>
<th>Very-Low (50%)</th>
<th>Low -Income (80%)</th>
<th>Moderate-Income (120%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Person</td>
<td>$25,050</td>
<td>$41,700</td>
<td>$66,750</td>
<td>$76,500</td>
</tr>
<tr>
<td>2 Person</td>
<td>$28,600</td>
<td>$47,650</td>
<td>$76,250</td>
<td>$87,450</td>
</tr>
<tr>
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<td>4 Person</td>
<td>$35,750</td>
<td>$59,550</td>
<td>$95,300</td>
<td>$109,300</td>
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<tr>
<td>5 Person</td>
<td>$38,650</td>
<td>$64,350</td>
<td>$102,950</td>
<td>$118,050</td>
</tr>
<tr>
<td>6 Person</td>
<td>$41,500</td>
<td>$69,100</td>
<td>$110,550</td>
<td>$126,800</td>
</tr>
<tr>
<td>7 Person</td>
<td>$44,350</td>
<td>$73,850</td>
<td>$118,200</td>
<td>$135,550</td>
</tr>
</tbody>
</table>

**Eligibility:**
The policy manual will also describe policies on who is eligible to apply for and the selection of preferences (if any) will be offered for the affordable housing units that are constructed in the City of Inglewood. Generally, first priority will be given to persons who have been displaced by activities of the City of Inglewood or its related municipal public bodies, pursuant to California Health and Safety Code Section 33411.3. The second priority is given to persons who are residents of Inglewood. The third priority is given to persons with disabilities, and the forth priority is given to the Elderly (62 years or older). The Developer is responsible for screening tenants for
suitability. The Waiting List Policy Manual also describes a list of ineligible applicants who are prohibited from occupying the affordable housing units.

It is also important to note that this waiting list is separate and independent of the Inglewood Housing Authority waiting list for a Section 8 voucher.

FINANCIAL/FUNDING ISSUES AND SOURCES:
There is no financial impact to the General Fund to approve this Resolution.

DESCRIPTION OF ANY ATTACHMENTS:
Attachment No. 1 – Resolution

PREPARED BY:
Roberto Chavez, HUD Programs Manager
Walter Lauderdale, Senior Program Specialist

COUNCIL PRESENTER:
Roberto Chavez, HUD Programs Manager
RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
INGLEWOOD, CALIFORNIA, ADOPTING AN AFFORDABLE
HOUSING WAITING LIST POLICY MANUAL AND
AUTHORIZING THE CITY MANAGER OR DESIGNEE TO
AMEND THE MANUAL

WHEREAS, the City of Inglewood incentivizes developers to build affordable
housing by offering a density bonus; and

WHEREAS, there are approximately forty-two (42) affordable housing units in
the construction pipeline that will require referrals to fill these vacancies; and

WHEREAS, an affordable housing waiting list policy manual will provide
essential guidelines for applicants and assist city staff with the management and referral
process; and

WHEREAS, the City Council has reviewed the City of Inglewood Affordable
Housing Waiting List Policy Manual; and

WHEREAS, the City Council desires to adopt the Manual, and authorize the City
Manager or their designee to amend the Manual from time to time;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF
INGLEWOOD DOES RESOLVE AS FOLLOWS:

SECTION 1. The City of Inglewood Affordable Housing Waiting List Policy
Manual, attached hereto as Exhibit “A”, is hereby adopted.

SECTION 2. The City Manager or their designee, may amend the Manual from
time to time and as necessary without seeking City Council approval. However, any
amendments must be reported to the City Council at the next available City Council
meeting.

SECTION 3. The City Clerk shall certify to the adoption of this resolution and
the same shall be in full force and effect immediately upon adoption.

///
PASSED, APPROVED AND ADOPTED this ___ day of
__________________, 2023.

________________________________
James T. Butts, Jr.
Mayor

ATTEST:

________________________________
Aisha L. Thompson
City Clerk
CITY OF INGLEWOOD

City of Inglewood Affordable Housing Waiting List Policy Manual
January 2023

AFFORDABLE HOUSING DIVISION
ONE WEST MANCHESTER BLVD., SUITE 750
INGLEWOOD, CALIFORNIA 90301
(310) 412-8844
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AFFORDABLE HOUSING WAITING LIST MANAGEMENT POLICY MANUAL

OVERVIEW

The City of Inglewood ("The City") has developed a waiting list policy to organize, manage and prioritize those persons interested in obtaining affordable housing. This includes policies on how staff will notify the public regarding the opening and closing of the waiting list, updating applicant information, purging applicants that are no longer interested in or eligible for affordable housing, and the process for referring applicants to new affordable housing developments. This waiting list is separate and independent of the Inglewood Housing Authority waiting list for a Section 8 voucher. Once approved by the City of Inglewood Mayor and City Council, this policy may be updated by the City Manager or his designee as needed.

The City's waiting list may be organized in such a manner to allow the City to accurately identify and select applicants in the proper order. The waiting list will contain the following information for each applicant listed:

- Name and social security number of head of household
- Unit size and number of family members
- Amount and source of annual income
- Accessibility requirement, if any
- Date and time or site-based waiting list opening date and lottery number
- Household type (family, elderly, disabled)
- Admission preference, if any
- Race and ethnicity of the head of household

The City will establish and maintain one (1) general affordable housing waiting list for all of the affordable housing developments in the City of Inglewood that are contractually obligated to participate in this program. The City will make waiting list referrals to developers that build affordable housing within the City of Inglewood. Some of the developments that will receive referrals from the City include, but are not limited to Density Bonus properties, Inclusionary Housing properties or other General Affordable Developments.

Closing the Waiting List

The City is permitted to close the waiting list, in whole or in part, if it has an adequate pool of applicants to fully lease up developments. The City may close the waiting list completely, or restrict intake by preference, type of project, or by size and type of dwelling unit. The City may close the waiting list when the estimated waiting period for housing applicants on the list reaches approximately 24 months for the most current applicants. Where the City has particular preferences or other criteria that require a specific
category of family, the City may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

If the waiting list has been closed, it may be reopened at any time. The City will publish a notice announcing the opening of the waiting lists in local newspapers of general circulation, media that target LEP’s, and other suitable media outlets. Such notice must comply with HUD fair housing requirements. The City will specify who may apply, and where and when applications will be received.

The City will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of individuals or families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received. The notice will also contain considerations for individuals or families with Limited English Proficiency (LEP) and postings will also be in Spanish.

The City will give public notice by publishing the relevant information in suitable media outlets including, but not limited to community based organizations, newspapers, and on line on The City website at www.Cityofinglewood.org/162/Housing

The City is committed to providing safe and decent housing to all eligible individuals and families. Community outreach, during the open application period, is a means of ensuring unrestricted participation.

In order for eligible individuals and families to be aware of the various public housing programs and availability, the city will publish advertisements in newspapers of general circulation, ethnic and gender-focused publications, and other appropriate resources.

The City will distribute fact sheets to the broadcasting media and initiate personal contacts with news media.

The status of housing availability may be shared with other community service providers to inform them of eligibility requirements and guidelines so that proper referrals to The City will be made.

Marketing and informational materials will be subject to the following:

a) Compliance with Fair Housing Act requirements on wording, logo, size of type, etc. (24 CFR 109.30(a));

b) Providing an accurate description of the housing units, application process, waiting list and preference structure;

c) Using clear and easy to understand terms and more than strictly English-language print media;

d) Making clear who is eligible: low income individuals and families; working and non-working people; and people with both physical and mental disabilities; and,

e) Specifying that reasonable accommodations will be made for persons with disabilities.
The City conducts outreach as necessary to ensure that it has a sufficient number of applicants on the waiting list to fill anticipated vacancies and to assure that The City is affirmatively furthering fair housing and complying with the Fair Housing Act.

The City outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations.
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program.
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class.

The City outreach efforts are designed to inform qualified individuals and families about the availability of units under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers.
- Developing informational materials and flyers to distribute to other agencies.
- Providing application forms to other public and private agencies that serve the low income population.
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities or families who are least likely to apply.

The City will monitor the characteristics of the population being served and the characteristics of the population as a whole in The City's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

REPORTING CHANGES IN FAMILY CIRCUMSTANCES

While the individual or family is on the waiting list, the applicant must inform The City of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing or any other medium required by the City.

Changes in an applicant's circumstances while on the waiting list may affect the family's qualification for a particular bedroom size or entitlement to a preference. When an applicant reports a change that affects their placement on the waiting list, the waiting list will be updated accordingly.

Purging the Waiting List

The decision to remove an individual or family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to The City's request for information or updates because of the family member's disability, The City must, upon the family's
request, reinstate the applicant family to their former position on the waiting list as a reasonable accommodation.

The waiting list will be updated periodically to ensure that all applicant information is current and timely.

To update the waiting list, the City will send an update request via first class mail or e-mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that the City has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant’s name being removed from the waiting list.

The individual or family’s response must be in writing and may be delivered in person, by mail, or by fax. Responses should be postmarked or received by The City not later than 30 business days from the date of The City letter or correspondence that was sent to the applicant.

If the family fails to respond within 30 business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, staff will attempt to call the applicants last known phone number before removing the applicant from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date the letter was re-sent. If the family fails to respond within this time frame, staff will attempt to call the applicant at the last known phone number provided, before removing the applicant from the waiting list without further notice.

When an individual or family is removed from the waiting list during the update process for failure to respond, an informal hearing will not be offered. Such failures to act, on the part of the applicant, prevent the City from making an eligibility determination; therefore no informal hearing is required.

If a family is removed from the waiting list for failure to respond, the Executive Director or his designee may reinstate the family if she or he determines the lack of response was due to the City error or to circumstances were beyond the individual or family’s control.

**Removal from the Waiting List**

The City will remove an applicant from the waiting list upon request by the applicant. In such cases no informal hearing is required.

If The City determines that the applicant is not eligible at any time while the individual or family is on the waiting list the applicant will be removed from the waiting list.

If an applicant is removed from the waiting list because the City has determined the applicant is not eligible for admission or for failing to respond to a request from the City, a notice will be sent to the applicant’s address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list.
Eligibility

This section establishes priorities for eligibility to occupy On-Site Affordable Residences, describes categories of persons ineligible to occupy On-Site Affordable Residences, and outlines the procedures whereby the City Housing Division shall establish, maintain, and update the list of eligible tenants.

A. Priority Households
In establishing the list of households eligible to occupy affordable residences, the Housing Division shall adhere to the following priorities:

a) First Priority - Persons who have been permanently displaced or face permanent displacement from their housing residences in the City of Inglewood as a result of any of activities of the City of Inglewood or its related municipal public bodies, pursuant to California Health and Safety Code Section 33411.3.

b) Second Priority – Inglewood Resident (When verifying and awarding this preference, the City will use the standard described in the Inglewood Housing Authority Administrative Plan, Chapter 4.III.C & 4 –III.F)

c) Third Priority – Disabled

e) Fourth Priority – Elderly (62 and over)

B. Persons Ineligible to Occupy an Affordable Residence
- Any City employee, elected official, or commissioner who have, by virtue of their position, policy-making authority or influence over the implementation of the Affordable Housing Production Program, as well as the immediate relatives of such City employees, commissioners or elected officials.

- The immediate relatives of the applicant or owner, including a spouse, child, parent, grandparent, brother, sister, father-in-law, mother-in-law, son-in-law, daughter-in-law, aunt, uncle, niece, nephew, sister-in-law, and brother-in-law.

Other parties disqualified from occupying affordable residences include:
- Tenants for whom the affordable residence will not be their sole residence.

- Employees of the owner or the owner’s agents, including, but not limited to employees of the property management company, except as required by law. An example of an exception would be a 100 percent affordable building that is required by law to provide onsite management, and must therefore use an affordable residence.

- Employees of any corporation or other entities where the owner has more than a 10 percent equity, participation, revenue, or ownership interest.

- Immediate relatives, including a spouse, child, parent, grandparent, brother, sister, father-in-law, mother-in-law, son-in-law, daughter-in-law, aunt, uncle, niece, nephew, sister-in-law, and brother-in-law, of any other individual or entity with a financial interest in the property.

- Households where all adults are full-time students unless all members of the household meet all of the following criteria:
- Twenty-four years of age or older,
- Have lived separate from their parents for at least one year,
- Are not claimed as a dependent pursuant to IRS regulations on any tax return for the most recent tax year, and
- The head of household provides written certification of all outside financial assistance and at least one member of the household meets one of the following criteria:
  - A veteran or active duty member of the U.S. military,
  - Have one or more legal dependents other than a spouse,
  - Live with a recognized disability,
  - Be a graduate or professional student,
  - Be married, or
  - Have been an orphan or ward of the court through age 18.

Referrals
The City may refer applicants to an affordable housing project from the waiting list based on preference, date and time or other method such as a lottery. Referrals will be sent to owner/developers that are participating in the construction of affordable housing. The City will typically refer two (2) applicants for each affordable unit that is available until the units are filled. Referrals that are not selected will be returned to the waiting list unless the referral is determined to be over-income, then the referral will be removed from the City waiting list. A referral that is not selected can only be returned to the waiting list two (2) times before being removed from the waiting list. Any referral being rejected by the Owner/Developer three (3) times will be considered ineligible for the Affordable Housing Program and will be removed from the waiting list. Each time the applicant is rejected by the Owner/Developer is considered a strike. Any applicant submitting false information, a registered sex offender or not meeting the criminal background requirements described in Chapter 3 of the Inglewood Housing Authority Section 8 Administrative Plan may be removed from the waiting list at any time. Developer/owners are always responsible for screening tenants for suitability. If an owner rejects a referral, he/she must do so in accordance with fair housing laws. The owner must notify the Housing Division of the reason for the denial.

Opting - out
Any applicant that is referred to an Owner/Developer that opt-out of or refuses to take an affordable unit that was made available, may do so on only one (1) occasion. An applicant that opts-out of taking an affordable unit will be returned to the waiting list for the next available affordable unit. If an applicant chooses to opt-out of taking an affordable unit a second (2nd) time, the applicant will be removed from the waiting list and he/she will need to re-apply for the waiting list when it re-opens. Each opt-out will count as a strike. However, two (2) opt-outs will count as a removal from the waiting list.

Strike - out
Each applicant that is referred to an Owner/Developer to fill a vacant affordable unit will be allowed to strike out two (2) times before being removed from the waiting list. Three (3) strike-out referrals will result in a removal form further consideration and removal from the waiting list. Each time an applicant on the waiting is referred to an Owner/Developer for consideration and he/she is not selected, will be considered a strike. If the Owner/Developer of a property does not evaluate a client for tenancy, this will not be considered a strike. Applicants that are removed will need to re-apply to the waiting list when the list reopens.
Income Limits
Due to the income variations in the different types of affordable housing, The City may collect applications from individuals whose income does not exceed one hundred twenty percent (120%) of the area median income, as amended from time to time.