

ResProp

Residential Property Management

RESIDENT SELECTION PLAN (WORKFORCE HOUSING)

Property Name: Centre at Abacoa

WORKFORCE HOUSING RESIDENT SCREENING &
SELECTION PROCESS

Thank you for applying to live in our community! This criterion is provided to you to define the process we use to select our Residents. ResProp Property Management is an Equal Housing Opportunity provider and seeks to process all applicants in a fair and consistent manner.

OCCUPANCY POLICY

- 1] ResProp Property Management has established standards on occupancy to permit the tenant to select the apartment size they deem appropriate to their needs while preventing overcrowding and underutilization of the apartment. At Centre at Abacoa, only one bedrooms are available through the Workforce Housing Program. Occupancy is based on the number of bedrooms in an apartment. 2 persons are allowed per bedroom, plus one additional occupant. Applicants wishing to appeal this policy may do so in writing to our Fair Housing Officer, 1101 W 34TH St., Austin, TX 78705.
- 2] In the event an applicant family member, or someone associated with that household, has a physical or mental handicap which requires an apartment larger than the size allowed above, ResProp Management will allow the applicant family to apply for an apartment of the required size if one is available.

PET POLICY

Management must pre-approve all pets before the pets are allowed in any apartment or on the property. There is a maximum of two (2) pre-approved pets per household. A pet fee of \$300 per pet will be required before the pet is allowed in any apartment or on the property. Centre at Abacoa reserves the right to restrict pets that demonstrate aggressive, threatening, or violent behavior. Breeds that are specifically prohibited are, but are not limited to: Doberman Pinchers, German Shepherds, Pit Bulls, Rottweilers, or any similar breeds/mixes.

PROJECT SPECIFIC REQUIREMENTS

This community may be designated for a special population. Applicants may be required to meet the restrictions as indicated below in order to proceed with the application process:

- In order to be given priority for a rental unit, at least one adult member of the household shall be employed by a business located within the town
- No other special population restrictions apply to this community.

APPLICATION PROCESS

- 1] Complete the Rental Application (one for each adult). An application cannot be accepted unless it is complete. The number of bedrooms being requested is one; the application must be signed and dated. Applications are accepted at the apartment community's rental office or by email to affordablehousing@respropmanagement.com or centreatabacoa@respropmanagement.com.
- 2] If an apartment is not available for occupancy when the application is submitted, you will be put on a waiting list. ResProp Property Management policy is to keep waiting lists open continuously. Your application will be screened and verified when an apartment becomes available prior to occupancy. If you do not choose to accept an apartment at that time, you will be removed from the waiting list. You may re-apply to be placed back on the waiting list if you are still interested.
- 3] Per Sec. 27-3198 (c) of the municipal code: In order to be given priority for a rental unit, at least one

adult member of the household shall be employed by a business located within the town.

- 4] If you are contacted and notified of an available unit, you will have three (3) days to update your application, or complete a full application, and complete the necessary paperwork to begin the screening process. If you do not contact management within a three-day period, you will be removed from the waiting list and the available unit will be offered to the next person on the waiting list. Once your application has been approved, you will have 7 days to execute a lease and other rental documents. If you do not execute the lease and other rental documents within 7 days, you will be deemed to have rejected the offered unit, will be removed from the waiting list, and the next person on the waiting list will be contacted for the available unit.

CHANGES IN INCOME OR FAMILY COMPOSITION FOR WAITING LIST APPLICANTS

If an Applicant's income changes to an amount which is no longer eligible under the limitations of the assistance program by the time the application reaches the top of the waiting list, written notice will be given advising the Applicant that: (1) they are not presently eligible for assistance under the Workforce housing program; (2) the Applicant could become eligible if the household income decreases, the Income Limit changes, or HUD grants an exception to the Income Limits, and (3) asks whether or not the Applicant wishes to remain on the waiting list. If an Applicant's Family composition changes resulting in a need for a different apartment size, management will, upon notification by Applicant, place the Family on the appropriate waiting list, maintaining their current waiting list status.

DETERMINING UNIT SIZE AT MOVE-IN

The management agent must balance the need to avoid overcrowding with the need to make the best use of available space and to avoid unnecessary subsidy. To determine if the family qualifies for a one bedroom, the management agent shall count:

- 1] all full-time members of the household.
- 2] children who are away at school but live with the Family during school recesses.
- 3] children who are subject to a joint custody agreement but live in the unit at least 50% of the time.
- 4] an unborn child or children who are in the process of being adopted or whose custody is being obtained.
- 5] foster children or children who are temporarily absent due to placement in a foster home.
- 6] live-in attendants; and foster adults.

The management agent 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. Generally, no more than two (2) persons may occupy a bedroom.

TRANSFER PROCESS

After tenancy commences, if a household wishes to transfer to a different apartment due to a change in family composition or other reason, they must complete an application and be placed on the waiting list as a new applicant. The household must meet occupancy requirements for the unit. After move-in if the unit becomes underutilized or overcrowded due to changes in family size, the management will require the family to move to an appropriate-sized unit when one comes available. If a resident requests a transfer for a medical reason certified by a quality individual, based on the need for an accessible unit or due to a request for a reasonable accommodation, the transfer will be granted when the appropriate unit becomes available. These transfers will take priority over applicants on the waiting list.

GENERAL REQUIREMENTS

- 1] Positive identification with a picture will be required (photocopy may be kept on file). A federal regulation effective June 19, 1995, requires applicants to declare that all family members residing in dwelling units are U.S. Citizens, or Non-Citizens with eligible immigration status, or applicants can choose not to contend that he or she has eligible immigration status thus making the applicant ineligible to qualify for the program. Documentation and verification of eligible noncitizen status and proof of age

will be required. Noncitizen's age 62 and older must sign a declaration of eligible immigration status and provide a proof of age document. U.S. Citizens must sign a declaration of citizenship.

- 2] All applicants must disclose social security numbers for all household members upon move in. Persons over the age of 62 and older as of January 31, 2010, whose initial determination of eligibility was begun prior to January 31, 2010, and those individuals who do not contend eligible immigration status are excluded from disclosure requirements. Applicants may be placed on the waiting list without proof of a social security number. If after 90 days the applicant has been unable to supply the required verification of social security number, the applicant will be determined ineligible and removed from the waiting list. Applicants have 90 days to provide documentation of social security number at the time the applicant is offered a unit. Applicants must disclose and provide verification of the accurate social security number assigned to each household member prior to being admitted. If verification of all household members has not yet been provided at the time a unit becomes available, the next eligible applicant must be offered the available unit. If the person who has not yet supplied an SSN is under the age of 6 and has not yet been assigned an SSN, and if this child was added to the household 6 months or less from the move-in date, the household will be given 90 days following the effective date of the move-in certification to provide documentation of the SSN for the child. An additional 90-day period will be granted if the failure to provide documentation of an SSN is due to circumstances that are outside the control of the household. Examples include but are not limited to delayed processing of the SSN application by the SSA, natural disaster, fire, death in family, etc. During this period, the child will be included as part of the household and will receive all of the benefits of the program in which the child is involved, including the dependent deduction. An interim recertification will be processed once the household discloses and provides verification of the SSN for this individual.
- 3] Primary applicants must be of legal age to enter into a legal contract under state and local laws.

INCOME/ASSET REQUIREMENTS

- 1] Gross annual income shall not exceed the Palm Beach County Income limits according to the annual estimate prepared by HUD. All forms of income must be disclosed. Information on the limits is available from the resident manager. Detailed information on the limits and asset/income requirements are available from the resident manager; however, this community serves residents in the following income bracket(s): Low Income (61 percent to 80 percent of area median income) & Moderate Low Income (81 percent to 100 percent of area median income).
- 2] All forms of income and assets are required to be directly 3rd party verified. Contact information must be supplied by the applicant/resident for management to accomplish this requirement. Other documentation may be requested or required to prove eligibility. Individual verification forms will be signed. Applicant has the right to not sign verification forms if either the requesting organization and/or the organization supplying the information is left blank. Gross annual income shall not exceed HUD income limits. All forms of income must be disclosed.
- 3] This property will follow HUD income targeting requirements. Applicant households will be admitted in wait list order.

ENTERPRISE INCOME VERIFICATION – EXISTING TENANT REPORT

All applicants MUST disclose if they are currently receiving HUD housing assistance. The owner/agent will not knowingly assist applicants who will maintain a residence in addition to the HUD-assisted unit. HUD provides the owner/agent with information about an applicant's current status as a HUD housing assistance recipient. The owner/agent will use the **Existing Tenant Report**, during the final eligibility review, to determine if the applicant or any member of the applicant household may be receiving HUD assistance. Copies of the report will be maintained in the applicant/resident file in accordance with HUD's record keeping requirements.

Since the applicant is required to provide current landlord information on the application, the owner/agent should be aware of the housing assistance. Nothing prohibits a HUD housing assistance recipient from applying to this property. However, the applicant must move out of the current property and forfeit any HUD voucher before HUD assistance on this property will begin. Special consideration applies to minor children where both parents share 50% custody or to applicants who are part of a "split" household.

The report gives the owner/agent the ability to coordinate move-out and move-in dates with the resident and the PHA or owner/agent of the property at the other location. The owner/agent will follow-up with the respective PHA or owner agent to confirm the individual's program participation status **before admission**. In addition, applicants will be notified that assistance will not be provided in the new unit until the day after assistance stops in the residence identified in EIV. If the applicant or any member of the applicant household

fails to disclose receipt of HUD assistance or rental history fully and accurately on the application, the applicant will be denied based on misrepresentation of information. If the owner/agent discovers a discrepancy, the applicant will be notified and will have 5 business days to respond to the inquiry. Failure to respond to owner/agents requests for additional information and/or providing false or incomplete information will result in denial or removal from the waiting list in accordance with the property's current resident selection plan. Unintentional errors that do not cause preferential treatment will not be used as a basis to deny assistance.

RENTAL/CREDIT REQUIREMENTS

- 1] Home ownership will be verified through the county tax assessor 's office. Mortgage payments must be current to reflect positive rental history. Home ownership negotiated through a land sales contract must be verified through the contract holder.
- 2] Eviction history in the last 4 years, and/ or Eviction history for the past 3 years from federally assisted housing for drug related criminal activity **will** result in a denial.
 - a. That an applicant is or is perceived to be, or has been or has been perceived to be, a victim of domestic violence, dating violence, or stalking, or has a prior eviction on his/ her record due to being the victim of domestic violence is not an appropriate basis for denial of tenancy. Landlord may request that an individual certify that the individual is a victim of domestic violence, dating violence, sexual assault, or stalking, and that the incident or incidents in question are bona fide incidents of such actual or threatened abuse. The individual shall provide a copy of such certification within 14 days after an owner, manager, public housing agency, or assisted housing provider requests such certification. An individual may satisfy the certification requirement by providing the requesting owner, manager, public housing agency, or assisted housing provider with documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, a member of the clergy, a medical professional, or any other professional, from whom the victim has sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking or the effects of the abuse. **All** information provided to an owner, manager, public housing agency, or assisted housing provider, including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking, shall be retained in the strictest confidence by such owner, manager, public housing agency, or assisted housing provider, and shall neither be entered into any shared database, nor provided to any related entity, except to the extent that disclosure is requested or consented to by the individual in writing or otherwise required by applicable law.
- 3] A credit report will be obtained. When evaluating your credit report the following will be considered:
 - a. Bill payment history.
 - b. The number and type of accounts that you have.
 - c. Late payments.
 - d. Collection actions.
 - e. Outstanding debt.
 - f. Age of your accounts.

CO-SIGNER REQUIREMENTS

- 1] A qualified co-signer for the lease must meet all of the standard residency criteria. The co-signer must provide photo and other legal identification as required by management and will have his/ her signature on the application and Co Signer Agreement notarized prior to occupancy by the applicant if unable to be available in person at the management office.
- 2] A co-signer will be required to sign a Co-Signer Agreement.
- 3] Co-signer will not be considered a member of the household.

LIVE IN CARE ATTENDANT/ AIDE

A qualified care attendant/aide will be subject only to criminal background search. Credit and income verifications will not apply.

CRIMINAL CONVICTION CRITERIA

Upon receipt of the Rental Application and screening fee, Owner/Agent will conduct a search of public records

to determine whether applicant or any proposed resident or occupant has a "Conviction" (which means: charges pending as of the date of the application; a conviction ; a guilty plea; or no contest plea), for any of the following crimes as provided: drug-related crime; person crime ; sex offense; crime involving financial fraud, including identity theft and forgery; or any other crime if the conduct for which applicant was convicted or is charged is of a nature that would adversely affect property of the landlord or a tenant or the health, safety or right of peaceful enjoyment of the premises of residents, the landlord or the landlord's agent. Owner/Agent will not consider a previous arrest that did not result in a Conviction or expunged records. If applicant, or any proposed occupant, is currently engaged in illegal use of drugs or there is a reasonable cause to believe that a member's illegal use or pattern of illegal use of a drug may cause an interference or if there is reasonable cause of behavior, from abuse or pattern of abuse of alcohol may cause interference, this may result in denial. If applicant, or any proposed occupant, has a Conviction in their past which would disqualify them under these criteria, and desires to submit additional information to Owner/Agent along with the application so Owner/Agent can engage in an individualized assessment (described below) upon receipt of the results of the public records search and prior to a denial, applicant should do so. Otherwise, applicant may request the review process after denial as set forth below, however, see item (c) under "Criminal Conviction Review Process " below regarding holding the unit.

A single Conviction for any of the following, subject to the results of any review process, shall be grounds for denial of the Rental Application.

- a) Felonies involving murder, manslaughter, arson, rape, kidnapping, child sex crimes, or manufacturing or distribution of a controlled substance.
 - b) Felonies not listed above involving : drug-related crime ; person crime; sex offense; crime involving financial fraud, including identity theft and forgery; or any other crime if the conduct for which applicant was convicted or is charged is of a nature that would adversely affect property of the landlord or a tenant or the health, safety or right of peaceful enjoyment of the premises of the residents, the landlord or the landlord's agent, where the date of disposition has occurred in the last 7 years.
 - c) Misdemeanors involving drug related crimes, person crimes, sex offenses, domestic violence, violation of a restraining order, stalking, weapons, criminal impersonation, possession of burglary tools, financial fraud crimes, where the date of disposition has occurred in the last 5 years.
 - d) Misdemeanors not listed above involving: theft , criminal trespass, criminal mischief, property crimes or any other crime if the conduct for which applicant was convicted or is charged is of a nature that would adversely affect property of the landlord or a tenant or the health , safety or right of peaceful enjoyment of the premises of the residents, the landlord or the landlord's agent, where the date of disposition has occurred in the last 3 years.
 - e) Conviction of any crime that requires lifetime registration as a sex offender will result in denial.
- Criminal Conviction Review Process.

Owner / Agent will engage in an individualized assessment of the applicant's, or other proposed occupant's, Convictions if: (1) Applicant has submitted supporting documentation prior to the public records search; or (2) applicant is denied based on failure to satisfy these criminal criteria and has submitted a written request along with supporting documentation. Supporting documentation MUST include:

- 1] Proof of employment or other income; and
- 2] a statement from the applicant; as well as one of the following:
 - i) Letter from parole or probation officer; or
 - ii) Letter from caseworker, therapist, counselor; or
 - iii) Certifications of various treatments/rehab programs;

Owner / Agent will:

- 1] Consider relevant individualized evidence of mitigating factors, which may include: the facts or circumstances surrounding the criminal conduct; the age of the convicted person **at** the time of the conduct; time since the criminal conduct; time since release from incarceration or completion of parole; evidence that the individual has maintained a good tenant history before and/or after the conviction or conduct; and evidence of rehabilitation efforts. Owner/Agent may request additional information and may consider whether there have been multiple Convictions as part of this process.
- 2] Notify applicant of the results of Owner/Agent's review within a reasonable time after receipt of all required information.
- 3] Hold the unit for which the application was received for a reasonable time under all the circumstances to complete the review unless prior to receipt of applicant's written request (if made after denial) the unit was

committed to another applicant.

VIOLENCE AGAINST WOMAN ACT PROTECTIONS

- 1] An applicant's or program participant's status as a victim of domestic violence, dating violence, sexual assault or stalking is not a basis for denial of rental assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission.
- 2] An incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking will not be construed as serious or repeated violations of the lease or other "good cause" for terminating the assistance, tenancy, or occupancy rights of a victim of abuse.
- 3] Criminal activity directly related to domestic violence, dating violence, sexual assault, or stalking, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, shall not be cause for termination of assistance, tenancy, or occupancy rights of the victim of the criminal acts.
- 4] Assistance may be terminated or a lease "bifurcated" in order to remove an offending household member from the home. Whether or not the individual is a signatory to the lease and lawful tenant, if he/she engages in a criminal act of physical violence against family members or others, he/she stands to be evicted, removed, or have his/her occupancy rights terminated. This action is taken while allowing the victim, who is a tenant or a lawful occupant, to remain.
- 5] The provisions protecting victims of domestic violence, dating violence, sexual assault or stalking engaged in by a member of the household, may not be construed to limit the O/A, when notified, from honoring various court orders issued to either protect the victim or address the distribution of property in case a family breaks up.
- 6] The authority to evict or terminate assistance is not limited with respect to a victim that commits unrelated criminal activity. Furthermore, if a O/A can show an actual and imminent threat to other tenants or those employed at or providing service to the property if an unlawful tenant's residency is not terminated, then evicting a victim is an option, the VAWA notwithstanding. Ultimately, O/As may not subject victims to more demanding standards than other tenants.
- 7] The VAWA protections shall not supersede any provision of any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence or stalking.

The laws offering greater protection are applied in instances of domestic violence, dating violence or stalking.

DISABLED ACCESSIBILITY

- 1] ResProp Property Management complies with section 504 of the Rehabilitation Act, the Fair Housing Act, and Title VI of the Civil Rights Act of 1964 and will not discriminate in any program or activity receiving federal financial assistance from HUD.
- 2] ResProp Property Management is committed to making the apartment community readily accessible to and usable by individuals with handicaps. ResProp Property Management will consider any request by or on behalf of a handicapped resident or applicant for: a) a reasonable accommodation relating to a change in its rules and/or policies; or b) a reasonable modification relating to alterations of the common areas or an individual unit. Any such request should be made in writing to the Portfolio Manager/Section 504 Coordinator located at ResProp Property Management 1101 W 34th St., #323, Austin TX 78705. If it is not possible to make the request in writing, ResProp Property Management will assist the person making the request and provide the necessary information.
- 3] In most instances, ResProp Property Management LLC will allow a handicapped person to have an assistance animal which is related to and necessary for the handicapped person to enjoy the benefits of the housing. A particular assistance animal may be rejected if:
 - a) the animal poses a direct threat to the health or safety of others that cannot be reduced or eliminated by a reasonable accommodation.
 - b) the animal would cause substantial physical damage to the property of others.
 - c) the presence of the animal would pose an undue financial and administrative burden to the apartment community owner or ResProp Property Management; or
 - d) the presence of the assistance animal would fundamentally alter the nature of the services provided by the apartment community owner or ResProp Property Management. No fees or

- additional security deposit will be imposed as a condition of allowing an assistance animal.
- 4] If a request for a reasonable accommodation or reasonable modification is granted, the cost to perform the accommodation or modification will be the landlord's unless the request will:
- a) impose an undue financial and administrative burden on the apartment community owner or ResProp Property Management; or
 - b) fundamentally alter the nature of the services provided by the apartment community owner or ResProp Property Management.

SECTION 504 OF THE REHABILITATION ACT OF 1973, THE FAIR HOUSING ACT AMENDMENTS OF 1988 **AND TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 AND HUD NOTICE 16-137**

- 1] ResProp Property Management LLC complies with Section 504 of the Rehabilitation Act of 1973 which prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance from HUD. 2] ResProp Property Management complies with The Fair Housing Act which prohibits discrimination in housing and housing related transactions based on race, color, religion, sex, national origin, disability, and familial status. It applies to housing, regardless of the presence of federal financial assistance.
- 3] ResProp Property Management complies with Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color or national origin in any program or activity receiving federal financial assistance from HUD.
- 4] ResProp Property Management complies with HUD Notice 16-137, The Final Rule - Providing Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity to ensure that housing is open to all eligible individuals and families regardless of actual or perceived sexual orientation, gender identity or marital status.

DECLINING APPLICANTS

Applicants may be declined if any one of the following categories applies:

- 1] Failure to meet one or more of the screening criteria.
- 2] Information required by the application and income verification process is not provided.
- 3] Failure to respond to written requests for information.
- 4] Declaration by Applicant that they are no longer interested in housing.
- 5] Unacceptable credit history.
- 6] Adverse information of former participants who have voluntarily or involuntarily terminated participation in HUD Section 8 rental assistance programs sourced through HUD's EIV system.
- 7] Income exceeds the appropriate Very Low-Income Family Income Limit (when dictated by Federal programmatic requirements).
- 8] Inability to appropriately maintain housing in a decent safe and sanitary condition.
- 9] Applicant is single, under 18 years of age
- 10] Family size is too large for available units, and serious overcrowding would result in providing a smaller unit.
- 11] History of unjustified and chronic nonpayment of rent and financial obligations.
- 12] History of disturbing the quiet enjoyment of others.
- 13] A risk of intentional damage or destruction to the unit or surrounding premises by the Applicant or those under the Applicant's control.
- 14] History of violence and harassment of others.
- 15] History of violations of the terms of previous rental agreements such as destruction of a unit or failure to maintain a unit in a decent, safe, and sanitary condition.
- 16] Criminal history includes felony or misdemeanor convictions for Drug Related Activity, violent crimes, sexual crimes, physical violence against persons or property, fraud, dishonesty, or any other criminal activity (excepting traffic violations) which, at the sole discretion of management, is deemed a risk to the well-being of the community.
- 17] Illegally using a controlled substance or abusing alcohol in a way that may interfere with the health, safety, and well being of other residents. Waiver of this requirement is subject to Applicant demonstrating they are no longer engaging in such activity and producing evidence of participation in or completion of a supervised rehabilitation program.
- 18] Applicant or a household member has engaged in or threatened abusive or violent behavior towards any staff member of management or another resident.
- 19] Applicant or a member of household was evicted from housing within three years as a result of Drug-Related Criminal Activity.

- 20] Applicant does not meet the criteria for a full or part time student household as defined by Section 8 of these criteria, if asking for assistance.
- 21] Application is incomplete or is found to contain false information.
- 22] Appropriately sized housing is not and will not be available in the apartment community.

If an Applicant is declined, Applicant will be informed in writing with an explanation of the reasons for decline. The Applicant will be notified that they have 14 days to respond in writing or to request a meeting to discuss the decline. All declined applications and supportive documentation shall be maintained at the management agent's home office in a manner that assures confidentiality.

REJECTION POLICY

You have the right to dispute the accuracy of any information provided to the landlord by a screening service or credit reporting agency. If your application is denied due to unfavorable information received during the screening process you will be notified in writing.

- 1] Contact the community manager where you applied to obtain a copy of your screening and the reason for denial. Your credit report can be provided either by Onsite or the screening company. The screening company that processed your application is **Corelogic**, Inc
- 2] Contact the credit reporting agency to identify who is reporting unfavorable information.
- 3] Correct any incorrect information through the credit reporting agent as per their policy.
- 4] Request the credit reporting agency submit a corrected credit check to the appropriate screening company.
- 5] Upon receipt of the corrected and satisfactory information, your application will be evaluated again for the next available apartment.

If you are a person with a disability and would like to request a waiver of the screening criteria, you may appeal the decision within 14 calendar days by sending a letter to: ResProp Property Management, LLC, Equal Housing Opportunity Manager, 1101 W. 34th St, #323, Austin TX 78705

In the letter explain the reasons you believe your application should be approved and request a review of your file. Please indicate in the letter which apartment community you have applied to. Within 5 working days of receipt, your application will be reviewed, and you will be notified of the outcome of the review. Persons with disabilities have the right to request reasonable accommodations to participate in the hearing process.

PRIVACY POLICY

We are dedicated to protecting the privacy of your personal information used to determine your eligibility. We have adopted a Privacy Policy to ensure your personal information is kept secure.