

Exhibit 6-9 Transfer Policy

Transfer determinations are made without regard to race, color, religion, national origin, sex, familial status, or disability.

- Transfers between assistance programs (i.e., Public Housing and Housing Choice Vouchers) are not allowed.
- Transfers between AHFC communities are not allowed in AHFC-Owned Housing.

1. Reasonable Accommodation

A family may request a transfer to a unit with accessible features as a reasonable accommodation for a family member with a disability that requires the features. Those types of requests are included in the explanation of AHFC's transfer categories below.

2. Transfer Categories

HUD Regulation 24 CFR 880.601

Responsibilities of owner.

(b) Management and maintenance. The owner is responsible for all management functions, including determining eligibility of applicants, selection of tenants, reexamination and verification of family income and composition, determination of family rent (total tenant payment, tenant rent and utility reimbursement), collection of rent, termination of tenancy and eviction, and performance of all repair and maintenance functions (including ordinary and extraordinary maintenance), and replacement of capital items. (See part 5 of this title.) All functions must be performed in accordance with applicable equal opportunity requirements.

Transfers may be requested by a family or may be required by AHFC. The types of transfers are listed below in descending order of priority. For example, an emergency transfer or relocation takes priority over reasonable accommodation transfer.

1. Emergency
2. Relocation/Modernization
3. Reasonable Accommodations
4. Administrative
5. Family Requests

2.A Emergency Transfer Plan

Families in these categories take priority over a new admission.

2.A.1. Health and Safety Condition of Unit

The unit or building conditions pose an immediate threat to a family's life, health, or safety, and AHFC is unable to make repairs in less than 24 hours. Examples of emergency conditions include: a gas leak, no heat or inadequate heat in the unit during the winter, no water, toxic contamination, lead-based paint abatement, or a serious water leak.

AHFC will pay the moving expenses and basic utility hook-up fees (not including telephone or cable fees) for this transfer where responsibility for damage is not yet established. The family may choose between having AHFC contract with a moving company to provide basic moving services or receive a flat rate not to exceed \$500 for moving expenses.

If the preponderance of evidence suggests that the damages are the responsibility of the family, the family bears the cost of the move.

2.A.2. Health and Safety of a Family Member

The immediate health or safety of a family member is at risk. The risk can be as a result of being a witness to a crime, being a victim of a hate crime or harassment, or being a victim of domestic violence, dating violence, sexual assault, or stalking.

The family is responsible for the costs associated with the move.

1. Crime

The family must request the transfer. Supporting documentation may be provided by a law enforcement agency, victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the family has sought assistance. Documentation may also include court records or law enforcement records.

2. Victim of Domestic Violence

The family must request the transfer (see section 6.A of the Violence Against Women Act exhibit for regulations regarding emergency transfers). A family eligible for the protections under VAWA may:

- a) Request a transfer to the first available unit of appropriate size in the same program in that community.
- b) Request to vacate a unit without proper notice.
- c) Request that the cost of damages to a unit as a result of domestic violence in the unit be reduced.

2.B Relocation due to Modernization

Families in this category take priority over a new admission. All HUD-assisted programs and projects are subject to the Uniform Relocation Assistance and Real Property Acquisition Policies Act. Relocation due to modernization or development is scheduled and managed in accordance with 24 CFR 42.

In these instances, the Uniform Relocation Act determines which moving expenses will be paid by the family and which expenses are paid by AHFC. Families will receive written notification regarding their rights during relocation.

2.C Reasonable Accommodations

Families in this category take priority over a new admission.

2.C.1. Accessible Unit Offer Order

When a unit with accessible features becomes available, AHFC will offer the unit in the following order:

1. First, to a current tenant with disabilities who requests the accessibility features of the vacant unit who resides in a non-accessible unit within the same AMP.
2. Second, in Anchorage only, to a current tenant with disabilities living in a non-accessible unit within another Anchorage AMP, who requires the unit's accessible features.
3. Third, if there is no current tenant who requires the accessible features of the vacant unit, to a qualified applicant from the respective waiting list who requires the features of the unit.
4. Fourth, if there is no qualified applicant who requires the features, to the first qualified family on the waiting list.

2.C.2. Moving Expenses

1. AHFC will pay the moving expenses and basic utility hook-up fees (not including telephone or cable fees) for an existing tenant approved to occupy a unit with accessible features as a reasonable accommodation.
2. AHFC will pay the moving expenses and basic utility hook-up fees (not including telephone or cable fees) to relocate an existing tenant that does not require the features from an accessible unit to a standard unit.

If AHFC is paying the moving expenses, the family may choose between having AHFC contract with a moving company to provide basic moving services or receive a flat rate not to exceed \$500 for moving expenses.

2.D Administrative

HUD Regulation 24 CFR 880.603(f)

(c) Reexamination of family income and composition

(1) Regular reexaminations. The owner must reexamine the income and composition of all families at least every 12 months. After consultation with the family and upon verification of the information, the owner must make appropriate adjustments in the Total Tenant Payment in accordance with part 5 of this title and determine whether the family's unit size is still appropriate. The owner must adjust Tenant Rent and the Housing Assistance Payment to reflect any change in Total Tenant Payment and must carry out any unit transfer required by HUD.

AHFC Policy

1. AHFC will determine the appropriate unit size for the family based on its composition at the most recent certification.
2. AHFC determinations of appropriate unit size will be provided to the family in writing.
3. The family is fully responsible for the costs associated with the move.

2.E Family Requests

Tenants may request to transfer for one of following reasons: employment, child or day care, medical care, or educational opportunities. The family is fully responsible for the costs associated with the move.

3. Notice to Move

Whenever a family is required to move, AHFC will provide a written notice to the family with their rights and the deadline to move.

4. Family Fails to Move

If a family refuses to move or is not moved within the allotted time period, the family has violated the lease agreement. Failure to move is a serious violation of the lease. If the family cannot move within the time limit, the family may request a time extension not to exceed five (5) business days.

5. Documentation

AHFC will maintain a listing of all required and requested transfers. This documentation will be archived following the procedures for archiving waiting lists.

Numbered Memo
20-17 Exhibit 6-9 Transfer Policy