

Part A

Program Overview

The Adelaide Moderate Rehabilitation Single Room Occupancy (SRO) program is a joint effort between Alaska Housing Finance Corporation (AHFC) and Adelaide, LLC (wholly owned by Anchorage Neighborhood Housing Services, dba NeighborWorks Alaska), hereinafter referred to as “NWA,” a private, not-for-profit agency and general partner in development of the Adelaide Building. The purpose of the program is to provide Section 8 rental assistance for low-income, homeless individuals.

AHFC (on behalf of HUD) entered into a long-term Housing Assistance Payment (HAP) contract with NWA for the Adelaide Building on February 1, 1997. The contract between NWA and AHFC guarantees rental subsidy for 70 units. Currently, the contract is renewed yearly.

The Adelaide Building was rehabilitated using Low Income Housing Tax Credit Program funds. That program requires NWA to enforce income eligibility requirements that mirror the S8 Moderate Rehabilitation SRO program. In order to ensure compliance with all applicable federal regulations for the Section 8 Moderate Rehabilitation SRO Program, AHFC and NWA agree to operate the program according to this Administrative Plan and federal regulations at 24 CFR Part 882, Subpart H.

AHFC entered into one HAP contract to make housing assistance payments during the contract term for all units. The subsidy is paid when NWA leases the unit to an eligible participant. Because the assistance is tied to the unit, a participant that moves from the unit does not have the right to continued assistance.

1. Waiver of Requirements

The CEO/Executive Director of AHFC or the Director of the Public Housing Division may waive all or part of any requirement set forth in these policies and procedures, to the extent that such a waiver would not conflict with state or federal law.

2. Fair Housing and Equal Opportunity

NWA is responsible for their own policy to comply fully with all federal, state, and local nondiscrimination laws, including the Fair Housing Act; Title VI of the Civil Rights Act; Section 504 of the Rehabilitation Act; the Americans with Disabilities Act; and U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity.

It is the policy of AHFC to comply fully with all federal, state, and local nondiscrimination laws, including the Fair Housing Act; Title VI of the Civil Rights Act; Section 504 of the Rehabilitation Act; the Americans with Disabilities Act; and U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity. A copy of AHFC's 504 Equal Access Statement and the Fair Housing Poster, form HUD-928.1A, is posted at each AHFC office site.

No person shall on the grounds of age, race, color, sex, religion, national or ethnic origin, familial status, disability, sexual orientation, gender identity, or marital status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under AHFC housing programs.

To further its commitment to comply fully with applicable Civil Rights laws, AHFC will provide federal, state, or local information to applicants and participants in all rental assistance programs covered by this plan. The information will cover discriminatory practices and any recourse available to the family if they believe they are victims of illegal discrimination. All applicable Fair Housing information and discrimination complaint forms will be made available at AHFC offices.

AHFC's Fair Housing Statement is included on each application. AHFC will also post, in a conspicuous place within each of its offices, the following information:

- Information about access to this Administrative Plan
- Income limits for admission
- Grievance procedures

2.A Reasonable Accommodation

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of AHFC housing programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program fully accessible to him/her in a way that would otherwise not be possible due to his/her disability.

Because disabilities are not always apparent, AHFC and NWA will ensure that all applicants and participants are aware of the opportunity to request reasonable accommodations. Notifications to families covering regular and interim examinations, inspections, appointments, or termination of assistance will include information about how to request a reasonable accommodation. In addition, all written information and advertisements will contain the appropriate equal opportunity language and logo.

2.B Marketing Plan

HUD Regulation 24 CFR 882.808(a)

Outreach to homeless individuals and appropriate organizations.

(1) The HA or the owner must undertake outreach efforts to homeless individuals so that they may be brought into the program. The outreach effort should include notification to emergency shelter providers and other organizations that could provide referrals of homeless individuals. If the owner conducts the outreach effort, the owner must notify the HA so that it may provide referrals of homeless individuals.

(2) Additional outreach concerns. If the procedures that the HA or owner intends to use to publicize the availability of this program are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, or mental or physical disability who may qualify for admission to the program, the HA or owner must establish additional procedures that will ensure that such persons are made aware of the availability of the program. The HA or owner must also adopt and implement procedures to ensure that interested persons can obtain information concerning the existence and location of services and facilities that are accessible to persons with disabilities.

(3) First priority for homeless individuals. Homeless individuals must have the first priority for occupancy of housing rehabilitated under this program.

AHFC Policy

1. NWA is responsible for marketing the Adelaide Building. Outreach efforts will take into consideration applicants with special needs, families who are least likely to apply, and other eligible families.
2. Only individuals who meet the homeless definition can be housed at the Adelaide Building.

2.C Limited English Proficiency (LEP) Plan

NWA is responsible for developing its own LEP Plan and communicating it to the residents of the Adelaide Building.

AHFC is committed to ensuring that Limited English Proficient (LEP) individuals have meaningful access to public housing assistance information and/or services regardless of their ability to communicate in English. LEP individuals are defined as individuals who do not speak English as a primary language or are limited in their ability to read, write, speak, or understand English.

AHFC will follow the procedures below to assist LEP families:

1. AHFC will use the Census Bureau Language Identification Flashcard¹, whenever necessary, to identify the language spoken by the LEP customer.
2. AHFC field staff will communicate with LEP customers by using, in descending order: in-house bilingual staff, adult family members, volunteer interpreters, telephonic interpretation services, or contract interpreters.
3. AHFC will honor a customer's request to use a bilingual case manager or social service worker as the interpreter, when the customer is accompanied to a housing assistance appointment by an interpreter.
4. AHFC will honor a customer's request to use an adult family member or adult friend as interpreter, if the customer is accompanied by the interpreter at an appointment.

3. Responsibilities

3.A Alaska Housing Finance Corporation

1. Perform quality assurance inspections in accordance with inspection requirements set forth in Part E;
2. Verify the portions of rent paid by the family and AHFC;
3. Make timely housing assistance payments to a landlord in accordance with the HAP contract;
4. Renew the contract yearly, which may include a rent increase.
5. Administer and enforce the housing assistance payments contract with NWA;
6. Provide sound financial management of the program.

3.B NeighborWorks Alaska

1. Publish and disseminate information about the availability and nature of housing assistance under the program;
2. Explain the program to families;
3. Affirmatively further fair housing goals and comply with equal opportunity requirements;
4. Market units with accessible features to people with disabilities;
5. Screen all family members and deny assistance according to policy;

¹ 2010 U.S. Census Bureau Language Identification Flashcard.

6. Receive applications from families, determine eligibility, maintain the waiting list, select applicants, and provide housing information to families;
7. Obtain and verify evidence of citizenship and eligible immigration status in accordance with 24 CFR 5;
8. Inspect the unit before the assisted occupancy begins and in accordance with inspection requirements set forth in Part E;
9. Determine the portions of rent paid by the family and AHFC;
10. Examine and verify family income, size, and composition at admission and in accordance with regular examination requirements;
11. Determine whether to terminate tenancy of a family for violation of family obligations;
12. Provide informal review procedures for certain decisions concerning applicants;
13. Provide informal hearing procedures for certain decisions concerning participants;
14. Provide sound financial management of the program.

4. Utility Allowance

HUD Regulation – 24 CFR 882.510

The PHA must determine, at least annually, whether an adjustment is required in the Utility Allowance applicable to the dwelling units in the Program, on grounds of changes in utility rates or other change of general applicability to all units in the Program. The PHA may also establish a separate schedule of allowances for each building of 20 or more assisted units, based upon at least one year's actual utility consumption data following rehabilitation under the Program. If the PHA determines that an adjustment should be made in its Schedule of Allowances or if it establishes a separate schedule for a building which will change the allowance, the PHA must then determine the amounts of adjustments to be made in the amount of rent to be paid by affected Families and the amount of housing assistance payments and must notify the Owners and Families accordingly. Any adjustment to the Allowance must be implemented no later than at the Family's next reexamination or at lease renewal, whichever is earlier.

AHFC Policy

There are no tenant-paid utilities at the Adelaide Building.

5. Privacy Act and Confidentiality of Records

NWA will specify its policies and procedures regarding the confidentiality of family records.

Families, applicants, or the public may request copies of documentation or policies from AHFC.

6. Quality Assurance

AHFC has developed a quality assurance policy and procedure. See Quality Assurance and File Maintenance.

7. Code of Conduct and Ethical Standards

NWA will specify its code of conduct and ethical standards in its policy and procedures.

The Public Housing Division adheres to the State of Alaska Executive Ethics Act (Alaska Statute 39.52.010). Every employee is required to acknowledge receipt and understanding of the Act at time of employment and annually.

In addition, AHFC's Personnel Rules include:

- Rule 15 - Drug- and Alcohol-Free Workplace Policy
- Rule 16 - Prohibited Employment Activities and Relationships
- Rule 17 - Reporting Misconduct or Violations of Law or Policy
- Rule 18 - Anti-Discrimination and Harassment
- Rule 19 - Threatening, Disruptive or Violent Behavior in the Workplace

8. Definitions

8.A Agreement to Enter into Housing Assistance Payments Contract (Agreement)

24 CFR 882.802

Agreement to enter into housing assistance payments contract (Agreement). A written agreement between the owner and the HA that, upon satisfactory completion of the rehabilitation in accordance with requirements specified in the Agreement, the HA will enter into a housing assistance payments contract with the owner.

8.B AHFC

The Alaska Housing Finance Corporation, the public housing authority responsible for administration of the Section 8 SRO program subsidy.

8.C Annual Contributions Contract (ACC)

This is a written contract between HUD and AHFC. Under the ACC, HUD agrees to make payments to AHFC, over a specified term, for housing assistance payments to owners and for AHFC's administrative fee. The ACC specifies the maximum payment over the ACC term.

8.D Applicant

An individual that has not executed a lease agreement and has not received any subsidy from AHFC.

8.E Eligible Individual

24 CFR 882.802

Eligible individual. An individual who is capable of independent living and is authorized for admission to assisted housing under 24 CFR part 5.

8.F Homeless

24 CFR 882.802

Homeless individual. An individual as described in section 103 of the McKinney Act (42 U.S.C. 11302).

8.G McKinney Act

24 CFR 882.802

McKinney Act. The Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11301 et seq.).

8.H Moderate Rehabilitation

24 CFR 882.802

Moderate rehabilitation. Rehabilitation involving a minimum expenditure of \$3,000 for a unit, including its prorated share of work to be accomplished on common areas or systems, to upgrade to decent, safe, and sanitary condition to comply with the Housing Quality Standards or other standards approved by HUD, from a condition below those standards (improvements being of a modest nature and other than routine maintenance).

8.I Owner

The Anchorage Neighborhood Housing Services, General Partner, dba NeighborWorks Alaska, and Adelaide SRO Limited Partnership, a not-for-profit housing provider and developer of the Adelaide SRO.

8.J SRO (Single Room Occupancy)

24 CFR 882.802

Single room occupancy (SRO) housing. A unit for occupancy by one person, which need not but may contain food preparation, sanitary facilities, or both.

Numbered Memo

20-22 Adelaide Administrative Plan Updates