



**SENIOR HOUSING ACCESSIBILITY MODIFICATIONS:
SENIOR ACCESS PROGRAM**

POLICY & PROCEDURE MANUAL

Funded through the State of Alaska Senior Citizen Housing Development Fund

Alaska Housing Finance Corporation

July 22, 2022

AHFC reserves the right to grant waivers on AHFC policies that are not based on statute or regulatory requirements. AHFC will consider waivers at the request of the Grantee on a case by case basis.



INTRODUCTION

The Senior Housing Accessibility Modification Program, commonly referred to as the “Senior Access Program” is provided through the Senior Citizen Housing Development Fund (SCHDF). The SCHDF is funded through AHFC corporate receipts and authorized by the State of Alaska legislature. The primary goal of Senior Access is to make modifications to existing housing for the purpose of increasing accessibility to allow current resident seniors to remain safely at home for as long as possible.

“**Small community**” – defined under state statute as a community with a population of 6,500 or less that is not connected by road or rail to Anchorage or Fairbanks, or with a population of 1,600 or less that is connected by road or rail to Anchorage or Fairbanks and at least fifty (50) statute miles outside of Anchorage or twenty-five (25) statute miles outside of Fairbanks. In this definition, connected by road does not include a connection by the Alaska Marine Highway System.

Under the Senior Access Program, Grantees provide and administer grants for qualifying senior households for the purpose of making needed accessibility modifications to their homes.

Grants are limited to:

1. \$25,000 for owner-occupied and \$20,000 for renter-occupied homes in Moderate Cost Areas: Defined as communities connected by road or rail to Anchorage or Fairbanks (within the State boundaries).
2. \$30,000 for owner-occupied and \$25,000 for renter-occupied homes in Intermediate Cost Areas: Defined as communities not connected by road or rail to Anchorage or Fairbanks (within State boundaries) that do not meet the definition of a Small Community
3. \$35,000 for owner-occupied and \$30,000 for renter-occupied homes in High Cost Areas: Defined as communities not connected by road or rail to Anchorage or Fairbanks (within State boundaries) that meet the definition Small Community.

Statewide, small state-licensed assisted living facilities that have less than five beds are eligible to receive up to \$10,000 for modifications. Modifications cannot exceed \$20,000 per assisted living facility.

AHFC provides Senior Access funding to non-profit organizations (“Grantees”) using a Notice of Funding Availability (NOFA) process. The Grantee administers the Senior Access Program in specified service areas, in accordance with AHFC guidelines.

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SECTION I: PROGRAM OVERVIEW

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Statewide, small state-licensed assisted living facilities that have less than five beds are eligible to receive up to \$10,000 for modifications. Modifications cannot exceed \$20,000 per assisted living facility.

The senior household must have limited financial resources, defined as no more than 100 percent of the area median income , adjusted for household size.

The Grantee must conduct a Household Needs Questionnaire and develop a Scope of Work of the proposed property that requires accessibility related improvements. The Grantee must determine that all the necessary work can be completed within the funds committed to the project, and ensure that the applicant is qualified, based on the eligibility criteria established in this Policy and Procedure Manual. The Grantee must coordinate and facilitate the execution of all required documents, ensure that the work is performed in accordance with all required property standards, and submit the required documentation to AHFC. Grantees may use licensed and bonded contractors or their own work crews to perform the accessibility work.

SECTION II: PROGRAM POLICIES

A. APPLICANT ELIGIBILITY

1) Income Eligibility and Determination

- a) **Income Limits.** To qualify for the Senior Access Program, all members of the senior household must show evidence that their gross annual income is below 100% of the area median income. Income eligibility for SAP funding is based on income limits published by AHFC. If the senior household's income is above these limits and the Grantee still feels that there is a justifiable need for the modification, the Grantee may ask the AHFC Program Manager for a waiver.

The income limits utilized for this program are published annually by census area. The income limits are usually updated between the months of February and April and issued in conjunction with the income-based Weatherization Program; the AHFC Program Manager will notify SAP Grantees in writing when the income limits are published.

- b) **Definition of Household Unit.** For the purposes of determining household size and income eligibility, the household unit is defined as all occupants of the dwelling unit.

The Grantee shall count the income of all adult household members with the exception of paid live-in aides. Except in unusual circumstances, a related person does not qualify as a live-in aid.

Temporarily absent family members should be included as part of the household.

- c) **Income Determination**
- i. **Automatic Qualification (AQ).** A household unit that meets one or more of the following conditions within the past 12 months of the eligibility determination automatically meets the SAP income eligibility requirements. A full income review is not required but an estimate of total household unit income must be recorded in the client file. The estimate may be provided by the applicant or determined by the Grantee. The Grantee shall document "automatic qualification" in the SAP project file with source documentation or third party verification:

AQ-A: The household unit:

1. lives in an owner-occupied, single-family Mutual Help Housing unit constructed and/or operated by a Grantee, which has not been conveyed; and
2. undergoes an annual income review by the Grantee or the Grantee conducts an AHFC-authorized income review.

AQ-B: An occupant has received APA/IA, ATAP, TANF, SSI, SNAP, Low-

Income Home Energy Assistance (federal LIHEAP), or SeniorCare benefits at least once during the 12 months preceding application approval. Therefore, a household that receives LIHEAP funds would meet these criteria.

AQ-C: The household includes one resident who is currently receiving services under the Medicaid Waiver

AQ-D: The household unit:

1. lives in a multi-family rental unit that is not owned by the government, which is restricted by an affordable housing program that uses the 24 CFR Part 5 Definition of income to qualify tenants; and
2. already has undergone an annual income review by the landlord within 12 months prior to submitting an application for the SAP.

ii. **Income Calculation.** For all other household units, the Grantee must determine that the household's gross annual income, adjusted by household size, is below 100% of the area median income by utilizing the income qualification methodology identified in the current AHFC Weatherization Operations Manual. This manual is located on AHFC's website
<https://www.ahfc.us/application/files/3016/1721/2455/wom2021s9.pdf>
(Refer to Section 1. Policies and Procedures, Income Eligibility).

iii. **No Income.** For household units with **no income**, the Grantee shall have the head of household or the person making the application sign a certification to such. In addition, the household must submit copies of taxpayers' most recent tax returns or have all adult members of the household unit sign IRS Form 4506T; the Grantee shall submit this form to the IRS to assist with determining the household's income eligibility. Evidence of a household's non-filing of taxes in and of itself does not adequately provide sufficient evidence that a household is income eligible for SAP. The Grantee that is unable to adequately document a household that has no income may consult the AHFC Program Manager for an acceptable alternative method for households that cannot be adequately processed using one of the methods above.

Another method for verifying no income is available for households that live a subsistence lifestyle, A recognized community leader, a current representative of the Village Council, or staff at a local Native Corporation may provide a written statement that corroborates the household unit's lack of income based on the third-party's personal knowledge of the household's income history.

d). **Required Income Documentation**

Income verification documents are to be provided whenever possible. When a photocopier is not available to copy income documentation, a Grantee's intake person reviewing the documentation shall certify to observing the documentation

used for the income calculation, noting the source of income, the date last received, gross amount, and term (one week, monthly, quarterly, etc.).

The Grantee must utilize the income documentation methodology identified in the current AHFC Weatherization Operations Manual. This manual is located on AHFC's website at <https://www.ahfc.us/application/files/3016/1721/2455/wom2021s9.pdf> (Refer to Section 1. Policies and Procedures, Required Income Documentation). Other alternatives may be acceptable upon obtaining prior approval from the AHFC Program Manager.

2) Qualification as a “Senior Household”

Qualifying seniors must also meet the definition of a “senior household” under 15 AAC 151.950 c.10.A., except that at the time the household is determined eligible for the program, it must qualify under a, b, c or d below. Under these regulations, “senior households” mean households that consist exclusively of:

- a) two or more individuals that are related to each other at least one of whom is 55 years of age or older;
- b) the surviving spouse of an individual who (a) was at least 55 years of age or older at the time of his or her death and (b) was living in the senior housing unit with the surviving spouse at the time of his or her death;
- c) an individual who is 55 years of age or older; or
- d) an individual or individuals described in a), b) or c) of this paragraph and others, regardless of their ages, who are essential to the care or well-being of the individual or individuals.

3) Household Need

To qualify for accessibility modifications, a senior household member must be in need of the modifications proposed. The Grantee may accomplish this by either completing a *Household Needs Questionnaire or Assessment* or obtaining third party verification. The Grantee is responsible for creating their own *Household Needs Questionnaire or Assessment* based on their organization's capacity and the needs of households they are serving. At a minimum this assessment must include:

- a) Applicant name and date;
- b) Physical location;
- c) Applicants rationale for the modifications needed; and
- d) Recommendation by the Grantee of modifications that need to be completed based on the assessment.

It is also recommended that the Grantee at this time discuss the parameters and guidelines of the Senior Access Program. It is preferred that the assessment be conducted in person or by phone. The person conducting the assessment does not have to be a part of the Grantee staff, but should have knowledge of the Senior Access Program guidelines. In exceptional circumstances, the assessment may be completed by the senior and returned to the Grantee.

If the Grantee cannot determine the applicant's needs for modification through the *Household Needs Questionnaire*, a third party other than the senior and Grantee may make recommendations for the modification. The need may be documented by a medical professional (doctor, nurse), case worker involved with the senior's care, or caregiver who is familiar with the senior's case (including a family member who provides care to the senior). This documentation will vary depending on the circumstances of the senior. If the Grantee determines another form of documentation is appropriate for a specific case, the Grantee may ask the AHFC Program Manager for approval of such alternative methods. The approval is to be maintained in the project file. A sample *Household Needs Questionnaire* is provided in Appendix A.

4) Past Due Child Support

B. TO BE ELIGIBLE FOR ASSISTANCE THE ASSISTED SENIOR(S) MUST NOT BE DELINQUENT (IN ARREARAGE) ON ANY CHILD SUPPORT OBLIGATION. THE GRANTEE MUST SEND VERIFY THE ASSISTED SENIOR'S CHILD SUPPORT STATUS THROUGH THE CHILD SUPPORT SERVES DIVISION(CSSD) WEBSITE [HTTPS://WWW.CHILDSUPPORT.ALASKA.GOV/HOME/VERIFICATION-INFORMATION.ASPX](https://www.childsupport.alaska.gov/home/verification-information.aspx). INCLUDE THE CSSD VERIFICATION IN THE CLIENT FILE. PROPERTY ELIGIBILITY

1) General Requirements

Properties eligible for Senior Access assistance must:

- a) Be the principal residence of an income-eligible senior household.
- b) Be a residential home, condominium dwelling, manufactured home, or other equivalent unit type approved by AHFC.
- c) Not be owned by the government (no public housing).

2) Tenure Requirements

Meet one of the following tenure requirements:

- a) Homeownership:
 - i. The title to the property and home is in the form of fee simple ownership or a minimum 99-year leasehold interest, except for manufactured homes and homes on trust or tribal lands. In cases where manufactured homes are on leased property, such as in manufactured home parks, the person must hold the title to the home, but is not required to own the lot. Housing located on trust or restricted Native lands must only have a leasehold interest of 50 years. Life-estates under the Senior Access Program are acceptable. If the unit is owned by the resident household, but the senior is not one of the owners named on the title, the home will still qualify as a homeownership household if the senior is a member of the owner's family or does not pay rent.
 - ii. The property must be a one to four unit dwelling or condominium.

- b) Rental or assisted living:
 - i. If the property is not state-licensed as an assisted living facility, it must be the current principal residence of a qualifying senior that is in current need of accessibility modifications. The owner of the rental housing must give his or her consent to the modifications and agree that the tenant's rent will not be increased due to the modifications to be made.
 - ii. If the property is a state-licensed assisted living facility, it must have no more than 5 beds and be the current principal residence of a qualifying senior that is in current need of accessibility modifications. The owner of the facility must give his or her consent to the modifications and agree that the tenant's rent will not be increased due to the modifications to be made.

3) Evaluation of Liens and Notices

The property cannot have an outstanding Notice of Default or Notice of Sale filed against it, this includes Student Loan Liens. To verify the property does not have a Notice of Default or a Notice of Sale filed against it, the Grantee can conduct a search on the State of Alaska, Department of Natural Resources Recorder's Office website at: <http://www.dnr.state.ak.us/ssd/recoff/search.cfm> or search the local jurisdiction. If the property cannot be located on this website, the applicant can be asked to sign a waiver that indicates that there is not a pending Notice of Default or Notice of Sale on the property.

4) Verification of Homeownership

The senior household or landlord must verify ownership.

- a) The preferred method of verification is to obtain a copy of a warranty or quitclaim deed, a copy of a long-term lease, or other appropriate form of title evidence. This documentation must be verified by through the State of Alaska, Department of Natural resources, Recorder's Office website <http://www.dnr.state.ak.us/ssd/recoff/search.cfm>.
- b) If the applicant cannot provide title information, they can submit other supporting evidence of ownership such as mortgage statements, homeowners insurance statements, appraisal documents, etc. These documents must be submitted to the AHFC Program Manager for approval.
- c) If the applicant cannot provide any proof of ownership, the Grantee may conduct a title search from a title insurance company in order to verify that the applicant is the owner of the property.
- d) If none of the above is available, the following may be suitable on a case-by-case basis:
 - i. When land ownership rests with a Native village or organization, a signed statement by a principal of the village or organization regarding ownership of the dwelling unit; or
 - ii. Other forms of verification as approved by the AHFC Program Manager.

NOTE: Option 4) d) is not intended to allow applicant households to receive SAP

services without a thorough review of ownership. A Grantee must document efforts to obtain ownership information using the methods listed in 4) a), b) and c) above.

5) Verification of Rental Residence

The senior household must verify principal rental residence.

- a) The preferred method of verification is to obtain a copy of the rental agreement.
- b) If a rental agreement cannot be obtained, the owner of the property must sign a verification form indicating that the property is the applicants' principal residence.
- c) If none of the above is available, the following may be suitable on a case-by-case basis:
 - i. When land ownership rests with a Native village or organization, a signed statement by a principal of the village or organization regarding the rental of the dwelling unit; or
 - ii. Other forms of verification as approved by the AHFC Program Manager.

NOTE: Option 5) c) is not intended to allow applicant households to receive SAP services without a thorough review of ownership or tenancy. A Grantee must document efforts to obtain tenancy information using the methods listed in 5) a) and b) above.

6) Verification of State-Licensed Assisted Living Facility

The senior household or Grantee must verify a State-Licensed assisted living facility at one of the following websites www.dhss.alaska.gov/dph or www.ahfc.us/senior-support/assisted-living/. Appendix C includes a list of State-Licensed assisted living facilities as of 02/2014.

C. PROPERTY STANDARDS COMPLETION REQUIREMENTS

1) Conform to Environmental Protection Agency's Renovation, Repair and Painting Rule (RRP)

On April 22, 2008, EPA issued a rule requiring the use of lead-safe practices and other actions aimed at preventing lead poisoning [Federal Register: April 22, 2008 (Volume 73, Number 78) Lead; Renovation Repair and Painting Program (RRP)]. Under the rule, beginning in April 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination. In addition, RRP requires that owners and occupants are provided the pamphlet "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools" no more than sixty (60) days before beginning renovations; the pamphlet can be downloaded in English, Spanish and other languages at <https://www.hudexchange.info/trainings/courses/epa-hud-model-renovator-initial-course-lead-safety-for-renovation-repair-and-painting1/>.

The Grantee must determine whether RRP compliance is required for a SAP- assisted property and document the use of certified contractors, if applicable. The Grantee's Project Files must document compliance with RRP. At a minimum, Project Files and/or Procurement Files that trigger RRP should include contractor licenses and RRP certification information, lead based paint testing results and clearance information. EPA allows cleaning verification by the renovator or clearance examination. The cleaning verification does not involve sampling and laboratory analysis of the dust. In addition, Project Files for pre-1978 assisted homes must document the delivery and receipt of the pamphlets to the owner/ occupants (see Appendix C).

2) Property Standards at Time of Project Completion

Because the Senior Access Program is concerned only with accessibility modifications, the resulting accessibility features are **only** subject to the property standards below. Upon completion, the dwelling must meet the accessibility needs of the senior to the maximum extent feasible. Accessibility modifications, including those needed by the senior, not necessarily the entire dwelling, must:

- a) Meet specifications set forth in the Uniform Federal Accessibility Standards (UFAS), unless a variation is required by the specific needs of the senior. In such case, a note must be made in the client's permanent file explaining the reason for the variation and be available to AHFC during inspections. The UFAS can be obtained at the following website: <http://www.access-board.gov/ufas/ufas-html/ufas.htm>.
- b) Meet any applicable manufacturer's specifications. For mechanical items, Grantees must request the product specifications with the bid packet and evaluate the quality of the product that the contractor is proposing to install. All specifications must be kept in the client's permanent file and be available to AHFC during inspections (e.g. chairlift specifications). Grantees are strongly encouraged to assist the senior with completing and submitting any applicable manufacturer warranties associated with items installed as part of the SAP Scope of Work.
- c) The work completed must be in compliance with current local code.
- d) The modification must be decent, safe, sanitary and in good repair upon completion.

3) Property Standards Inspections

Grantees must possess sufficient knowledge and experience to enable them to assess and certify that required property standards identified in this Policy and Procedure Manual have been satisfied. AHFC staff, as part of its Grantee monitoring requirement, will perform periodic property standards re-inspections, based on a random sample of the projects undertaken by the Grantee. It is anticipated that a minimum of 5 percent, or a higher percentage if determined to be necessary and/or appropriate by AHFC, of the projects will be re-inspected by AHFC for property standards compliance review.

For projects which involve modification activities consisting of a nature which require

local or state inspections (local code compliance, State Building Standards, and/or Building Energy Efficiency Standards), the Grantee shall ensure that such inspections are obtained. The Grantee must retain evidence of such required inspections in the applicable project file.

D. FUNDING PROVISIONS AND LIMITATIONS

1) Maximum Assistance Amount

The amount of Senior Access Program funding assistance provided to each senior may not exceed the levels identified in Section I of this manual.

In any situation above, if future needs merit additional assistance, the maximum may be reached at a later date on a cumulative basis, subject to funding availability and continued qualifications of the senior household and/or housing unit for the program.

2) Unanticipated Project Cost Waiver

If approved by AHFC in writing, in advance and as specified in this section, the limits in 1) a), b), or c) above may be increased to cover unanticipated costs associated with the original scope of work proposed, or additional work determined to be necessary during the course of the modification work. When seeking a waiver, the Grantee must provide the AHFC Program Manager with the household name, property address, the total proposed SAP assistance amount, description of the existing situation, description of the proposed accessibility modification and how it relates to the senior's needs.

3) Rural Expense Waiver

If approved by AHFC in writing, in advance and as specified in this section, the limits in 1) a), b), or c) above may be increased to cover rural expenses; such as, shipping, construction material, etc. to communities outside the state road system, that are associated with the original scope of work proposed. A Rural Expense Waiver must be submitted and approved by AHFC Program Manager (see Appendix A).

4) Lead Based Paint Up Front Waiver

The limits in 1) a), b), or c) above may be automatically exceeded by \$2,000 for projects that disturb lead-based paint in homes built before 1978 that require contractors be certified and follow specific work practices to prevent lead contamination in order to comply with the EPA RRP Rule [see Section II. C. 1)]. For projects that will utilize the Lead Based Paint Up Front Waiver, Grantees must submit the documentation with the Project Setup / Final Data Report (Appendix A) that:

- a) the home assisted was built before 1978; and
- b) lead based paint was found in the areas to be disturbed (Scope of Work, evidence of a positive lead based paint test) and the results of the cleaning verification by the renovator or clearance examination.

5) Subsidy Review

The Grantee must conduct a subsidy review to limit the investment of Senior Access Program funds, in combination with other sources of funds, to only that amount

necessary to meet the accessibility needs of the qualifying senior resident. Therefore, the Grantee must verify that they know of other resources that can provide the needed accessibility modifications; such as, Medicare, the Veterans Administration, DHSS' Brokerage Program, Dept of Education's Vocational Rehabilitation Modification program, other grant or loan programs, etc.

The Grantee must diligently attempt to coordinate services with the other programs. If the senior does qualify for other sources of funding this does not necessarily mean that the Grantee must deny the senior services; however, the Grantee must make an effort to research and collaborate with other sources of funding that are available. An Alaska Accessibility Modifications Programs resource list is provided in Appendix C to assist the Grantee in conducting a subsidy review. A Verification of Access Modification Assistance form must be included in every applicant file (see Appendix A).

If other sources of public and private funds are being used to rehabilitate and/or modify the residence, it must be documented in the project file. The Grantee may also choose to prioritize or modify their waiting list based on the recipient's ability to obtain additional sources of funding that can be used in conjunction with Senior Access. If the Grantee utilizes this priority, they must develop a consistent policy and disclose their policy to the applicants when they first apply for Senior Access assistance (see Applicant Priority, p.18).

E. ELIGIBLE ACTIVITIES, COSTS AND PAYMENT PROVISIONS

1) Eligible Project Costs

The total amount of Project Costs that the Senior Access Program funding may provide to each senior is defined in Section D (1) above. Eligible Project Costs include the following costs directly related to Senior Access Program modification work:

- a) building and material costs;
- b) labor costs;
- c) costs directly tied to improvements needed to meet state or local existing building or rehabilitation codes, such as the purchase of fire and carbon monoxide detectors;
- d) Architectural, engineering or related professional services required to prepare plans, drawing, specifications or work write-ups;
- e) Costs related to shipping/barging materials to the construction site;
- f) Administrative costs related to compliance with local code, such as filing a set-back waiver;
- g) Costs to process the financing for a project, such as fees for title evidence recording and filing of legal documents, building permits, attorney fees, private appraisal fees, and fees for an independent cost estimate and builders project and developers fees.
- h) Staff overhead costs directly related to carrying out the project, such as work specifications preparation, inspections, travel to and from the project site and other services related to assisting Senior Access recipients; and
- i) Costs permitted in Article 7 of the Grant Management guidelines.

2) Eligible Administrative Costs

Administrative Costs (general overhead not associated with specific Senior Access projects) include reasonable costs for the following:

- a) Staff and overhead directly related to completing project(s) such as: work specification preparation, client processing, or other services related to assisting recipients. These costs may be charged as administrative costs or as Project Costs at the discretion of the Grantee.
- b) Public information, including the provision of information and other resources to residents and citizen organizations participating in the planning, implementation, or assessment of projects being assisted with Senior Access funds.
- c) Activities that affirmatively further equal housing opportunities.
- d) Salaries, wages, and related costs of the Grantee's staff. In charging costs to this category, the Grantee may either include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities involve program administration assignments, or the pro-rated share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The Grantee may use only one of these methods. Program administration includes the following types of assignments:
 - i. Developing systems and schedules for ensuring compliance with program requirements.
 - ii. Developing agreements with entities receiving Senior Access funds.
 - iii. Monitoring housing for progress and compliance with program requirements, including program audits.
 - iv. Preparing reports and other documents related to the program for submission to AHFC.
 - v. Coordinating the resolution of audit and monitoring findings.
 - vi. Evaluating program results against stated objectives.
 - vii. Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in (a) through (d) above.
 - viii. Travel costs incurred for official business in carrying out the program.
 - ix. Administrative services performed under third party contracts or agreements, including such services as general legal services, accounting services, and audit services.
 - x. Other costs for goods and services required for administration of the program, including such goods and services as rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

3) Prohibited Costs

- a) Landscaping, except for restoration of the site following an eligible activity or for health or safety or accessibility reasons.
- b) Program funds may not be used to pay for relocation costs of any household member unless approved in writing by AHFC.

- c) Site improvements unless they are necessary to increase the accessibility of the home to a resident senior.
- d) General home improvement and rehabilitation activity, that is not necessary to pass Local or State Code inspection.
- e) Any other cost determined to be ineligible per Article 7 of AHFC's Grant Management Regulations.

4) Program Guidelines for Determining Eligible Activities

The Grantee is responsible for determining the accessibility modifications that will allow seniors to remain safely at home for as long as possible; the program guidelines provide a framework to assist the Grantee to determine necessary modifications and make funding decisions.

Eligible modification items may include, but may not be limited to, bathroom modifications; installation grab bars and handrails; kitchen modifications; lifting devices; ramp addition or repair; and, widening doorways or hallways. The Grantee must limit the investment of Senior Access funds, in combination with other sources of funds, to only that amount necessary to meet the accessibility needs of the qualifying senior resident.

Ineligible modification items include, but are not limited to: upgrades or repairs to the home; the construction of additional rooms; a deck that is not an integral part of an access ramp or lift; household appliances (refrigerators, stoves, microwaves, etc.); duplicative modifications that are not necessary in order to ensure that the senior remain in the home. In general, assistive technologies that are not permanently affixed to the home are not eligible.

Grantee must review the proposed work to ensure that the modifications relate to the following program guidelines:

- a) Modifications should address the senior's most immediate needs as they relate to improving safety and accessibility in the home.
- b) Needs should be prioritized to determine the most cost-effective solution for each issue.
- c) Modifications ensure basic accessibility, facilitate independent living and/or reduce the risk of harm to the senior.
- d) The Grantee should consider the anticipated duration of the senior's needs in determining eligibility and funding decisions.
- e) Structural modifications to homes must be limited to those that permit safe access to the building, and provide safe access to and movement within those areas that are essential to the client for the purposes of daily living. The modification should provide the client with a safe, barrier-free environment.

5) Advanced Payment

After receipt of the Grantee's Project Payment Summary Form, Project Setup Form, and a Funds Disbursement Request Form AHFC will advance payments of up to 80 percent (80%) of project costs. Construction must begin within 90 days of the advance payment. AHFC reserves the right to recapture any advances if site work has not begun within 90

days. Any interest earned on advances must be reported to AHFC on the Quarterly Financial Reports provided to the Grantee in their Grant Agreement. Payments to the Grantee will then be reduced by the amount of reported earned interest.

6) Scope of Work

Based on the *Household Needs Questionnaire* a *Scope of Work* must be developed to specify what is to be done, and estimate cost. AHFC provides a sample *Scope of Work* for the Senior Access Program in Appendix A. However, the Scope of Work the Grantee develops at minimum must include the following components:

- a) The date the form is filled out;
- b) The name of the person completing the Scope of Work;
- c) The name of the senior and/or owner of the property;
- d) The physical location (address) where the work will take place;
- e) A listing of the work to be done organized room by room; or trade by trade specifications; including:
 - i. The quantity and/or nature of the work;
 - ii. Material and labor;
 - iii. A listing of total estimated expenses; and,

f) Homeowners' signature approving proposed modifications (page by page).

If the homeowner's signature cannot be obtained on the initial Scope of Work due to the rural location of the project, a signature on a list or other narrative describing the proposed accessibility modifications (page by page) is sufficient.

It is recommended that the Scope of Work document consider the following:

- a) What modifications will impact local codes and ordinances? For example, does a waiver with the local government need to be filed because a ramp will violate the property set-back requirements?
- b) Is the property located in a flood plain? Will this affect the modifications?
- c) Will the work meet the property and inspection standards?
- d) What is the estimated cost of the accessibility modifications work?
- e) Will the work meet Uniform Federal Accessibility Standards?

F. ADDITIONAL REQUIREMENTS

1) Marketing and Outreach Requirements

The Senior Access Program requires an affirmative advertising and marketing program in which there are no barriers to obtaining housing because of race, color, religion, sex, handicap, familial status, or national origin. Grantees must complete the Affirmative Marketing and Outreach Plan form provided by AHFC on an annual basis. This plan must be consistent with the Outreach Plan submitted as part of the Grantee's application for funding. The Grantee is required to meet or attempt to meet the objectives outlined in their plan. Grantees should expect to be monitored annually on the performance of their plan to see if corrective action is needed. Grantees also need to assess the effectiveness of

their plan.

The plan should contain evidence of how the Grantee intends to market the program and attract hard to reach populations, such as seniors that have Limited English Proficiency (LEP), seniors living in rural areas, or very low-income seniors. At a minimum, Grantee's plan should include the following measures:

- a) Publishing an annual service announcement in the community or service area(s) the Grantee has been awarded, such as the Senior Voice. Grantees are exempt from this requirement if they have a current waiting list of over 20 senior households. All advertisements must contain the following information:
 - i. Instructions about where the applicant may apply.
 - ii. Recognition of AHFC Senior Citizen Housing Development Funds as source of program funding.
- b) Providing SAP programmatic fliers, brochures, or informational sheets to the following entities annually. (AHFC provides contact listings):
 - i. The State Independent Living Center for the area the Grantee is serving;
 - ii. Senior Advocacy Coalition;
 - iii. Alaska Commission on Aging; and
 - iv. At least one agency that works with targeted senior populations or provides other community housing services in the Grantee's awarded service(s) area, such as the local tribal housing authority.
- c) Registering and/or updating information about the Senior Access Program on <http://www.alaska211.org/>
- d) Communicating the equal housing opportunity message as well as displaying the equal housing opportunity and disability logotype, in all outreach publications to the senior population. This can be inserted into all written outreach tools, such as press releases, newsletters, brochures, advertisements, direct mail solicitation, requests for proposals, and related advertising.
 - i. Slogan: "Equal Housing Opportunity" (placed under the logo)
 - ii. Logo and slogan can be downloaded at:
 - a. <http://portal.hud.gov/hudportal/HUD?src=/library/bookshelf11/hudgraphics/fheologo>
 - b.

Suggested Logo Sizes for Advertisements	
Size of Advertisement	Size of Logo Type in Inches
½ page or larger	2X2
1/8 page up to ½ page	1X1
4 column inches to 1/8 page	½ x ½
Less than 4 column inches	Do not use

The Affirmative Marketing and Outreach Plan form is provided as an attachment in the Grant Agreement. .

2) Equal Opportunity and Fair Housing

Grantees must adhere to the following Federal Equal Opportunity and Fair Housing laws.

- a) **Fair Housing Act.** Requirements of the Fair Housing Act (42 U.S.C. 3601-20) and implementing regulations at 24 CFR part 100; Executive Order 11063, as amended by Executive Order 12259 (3 CFR, 1958-1963 Comp., p.652 and 3 CFR, 1980 Comp., p. 307) (Equal Opportunity in Housing) and implementing regulations at 24 CFR part 107; and title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and implementing regulations issued at 24 CFR part 1.
- b) Fair housing law protects all citizens from discrimination on the basis of race, color, national origin, religion, sex, handicap or familial status (families with children under the age of 18 living with parents or legal custodians; pregnant women and people securing custody of children under 18).

The Fair housing act also states that a landlord may not:

- i. Refuse to let a person with a disability make a reasonable modification to a dwelling or common use areas, at their expense, if necessary for the disabled person to use the housing. (Where reasonable, the landlord may permit changes only if they agree to restore the property to its original condition when they move.)
 - ii. Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.
- c) **Equal Employment Opportunity.** Requirements of Executive Order 11246 (3 CFR 1964-65, Comp., p. 339) (Equal Employment Opportunity) and the implementing regulations issued at 41 CFR chapter 60.

3) OMB Circulars

Although Senior Access is not a federally funded program, AHFC requires that Grantees be compliant with OMB Circular Numbers A-122 and A-87.

4) Procurement Procedures

If the Grantee chooses to purchase items or services that have a value of greater than \$5,000 from contractors or subcontractors to complete a Senior Access activity, they must develop their own written uniform procurement standards. These standards must be in accordance with the State of Alaska Article 7, 15 AAC154.715 and OMB Circular A-110.40.

It is recommended that the Grantee's Procurement Standards include the following:

- i. Policies for documenting the types of services allocated.
- ii. Procedures for documenting that at least three bids were obtained, to ensure adequate competition. If necessary, procedures for documenting that there were a limited numbers of suppliers and three bids could not be obtained.
- iii. Documentation of the most responsive bidder and the rational for why the bidder was chosen to receive the contract.

5) Debarment and Suspension

A Grantee or any subcontractors used by the Grantee may not be presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in any Federal programs. The Grantee may verify this information by conducting a search on the System for Award Management located at www.sam.gov

6) Application Form

To best serve each specific community and population, the Grantee has the responsibility of creating their own application form. However, it must collect the following information about the applicant: name, physical address, mailing address, household annual income, phone number, residential status (owner or renter), and an age disclosure statement. A sample Application form can be found in Appendix A. The application must also include a Reasonable Accommodation Request Statement. Please review the sample Application and Reasonable Accommodation form provided by AHFC in Appendix A for more clarification on these requirements. If the Grantee chooses to alter some applicants' status on their waiting list because they are using combined sources of funding (see below) then this information *must* be disclosed on the application form.

7) Applicant Priority

Senior Access does not have an official priority policy that Grantees must adopt. Grantees may propose a priority policy to the AHFC Program Manager for prior approval. Approved written policies are expected to be used to prioritize applications. Project set-up, and subsequent modification activities, should reflect, as closely as possible the prioritization.

8) Assistance Agreement and Notice of Completion

Senior Access assistance is provided to qualifying homeowners and senior tenants in the form of a grant. Eligible recipients receiving Senior Access funds must execute either an

Assistance Agreement or a Landlord-Tenant Agreement (depending on the tenure of the senior household). AHFC provides a standard Assistance Agreement and Landlord-Tenant Agreement for the program in Appendix B. Grant Amount Modifications require both the Owner's initials and the Grantee's initials in Section 1. B) of the Senior Access Program Assistance Agreement. A Grantee is not required to obtain an Owner's initials if there is a reduction in the Grant Amount. In these instances, the Grantee is required to notify the Owner(s), in writing of the reduction in the Grant Amount. The Grantee must retain evidence of this notification in the Project File.

After the modification work is finished the senior must sign a Notice of Completion or a Certificate of Completion indicating that the project has been completed to the satisfaction of the senior and the Grantee. The Notice of Completion is a recorded document and protects the homeowner in the event a mechanics or materials lien is placed on the property. If the Grantee's crews are completing the work, there is a limited risk of a mechanics or materials lien being placed on the property; in this scenario the Grantee may decide to execute the Certificate of Completion. Either the Notice of Completion OR the Certificate of Completion form is acceptable for the Senior Access Program. The Notice of Completion and the Certificate of Completion form can be found in Appendix B.

9) Final Data Collection

Upon completion of a project, Grantees must complete a Final Data Report. The Final Data Report must be submitted with the final Funds Disbursement Request for each project. Please see Appendix A for the Final Data Report.

SECTION III. RECORDKEEPING AND MONITORING

A. RECORD KEEPING

Grantees shall be responsible to establish and maintain sufficient records to enable AHFC to determine whether the Grantee has met the requirements of the Grant Agreement and this Policies and Procedures Manual.

The Grantee must provide AHFC or any of their representatives, with reasonable access to all and any pertinent books, documents, papers or other records pertaining to the Grantee's administration of SAP funds provided by AHFC.

Records must be retained by the Grantee as follows:

- a) Written agreements must be retained for five years after the Grant Agreement terminates; and,
- b) If any litigation, claim, negotiation, audit, or other action has been started before the expiration of the regular period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the required period, whichever is later.

Grantee files must retain and collect the following information:

Program Files	
1.	Grant Agreement
2.	Grant Amendments, if applicable
3.	Insurance documents
4.	Correspondence with AHFC
5.	Quarterly and final reports
6.	Affirmative Marketing and Outreach Plans with supporting documentation
7.	AHFC Monitoring reports and Grantee responses
8.	Waivers for conflict of interest prohibitions
9.	Procurement policy
10.	Priority policy, if applicable
11.	Advertisements for bids and proposals

Financial Files	
1.	Cost allocation plan
2.	Administrative costs summary and supporting data
3.	Copies of administrative payment request forms
4.	Summary of project costs, project payment requests, and supporting data
5.	Evidence of periodic account reconciliation
6.	Records demonstrating compliance with applicable Uniform Administrative Requirements (OMB Circulars)

Procurement Files	
These documents can be kept in separate files or with the project documents	
1.	Advertisements for bids and proposals
2.	Documentation of bids and proposals obtained and awarded
3.	Contractor licenses and RRP certification, if applicable
4.	Debarred and suspension website check
5.	Contract between Grantee and contractor, if applicable
6.	Contractor invoice and payment records

Project Files	
One file per property must be kept	
1.	Senior Access Application Form
2.	Request for Accommodation Form, if applicable
3.	Income Verification Documentation
4.	Print out of Recorder's Office search or title search, if applicable
5.	Copy of ownership or lease documents
6.	A copy of the AHFC Project Data Form
7.	Household Needs Questionnaire or Assessment
8.	Third party verification of household needs, if applicable
9.	Verification of Access Modification Assistance form
10.	Documentation of the delivery and receipt of LBP "Renovate Right" pamphlet, if applicable
11.	Copy of Assistance Agreement
12.	Copy of Landlord-Tenant Agreement, if applicable
13.	Scope of Work
14.	State and local code inspection documentation

15.	Copy of Notice of Completion
16.	Copy of Funds Disbursement Request Form(s)
17.	Project waivers/correspondence provided by AHFC
18.	Copy of approved funding limitation waiver, if applicable
19.	Rural Expense Waiver
20.	Copy of manufactures specifications and warranty for modification equipment, if applicable
21.	Pre-modification pictures
22.	Post-modification pictures
23.	Property location map
24.	LBP test results and clearance results, if applicable. (NEW)

DOCUMENTATION SUBMITTED TO AHFC

Documents Submitted to AHFC	
Please be advised if AHFC does not receive these documents or if the documents have deficiencies, payments will held until corrective actions are taken by the Grantee.	
1.	Project Payment Summary Form—Projects with advances ONLY (required at Project Setup and with Final Data Report)
Required for final 20% payment or the entire disbursement of project funds:	
2.	Funds Disbursement Request Form
3.	Assistance Agreement
4.	Notice of Completion / Certificate of Completion
5.	Project Setup Form/ Final Data Report Form
6.	Copy of approved funding limitation waiver, if applicable
7.	Rural Expense Waiver, as applicable

B. GRANTEE MONITORING

Not less than annually, AHFC will financially and/or programmatically monitor the performance of each Grantee, in accordance with the requirements of this Policy and Procedure Manual, and the terms and conditions of the Grantee Agreement executed between the Grantee and AHFC for the purposes of funding activities under the Senior Access Programs.