

# Chapter 1

## Overall Approach

This Administrative Plan has been prepared by the Alaska Housing Finance Corporation (AHFC) in conformance with the requirements of 24 CFR 982.54. The plan sets forth AHFC's policies and operating procedures for the administration of the program in accordance with the requirements of the U. S. Department of Housing and Urban Development (HUD) and the AHFC Public Housing Moving to Work Plan.

Requirements for this program are incorporated by reference, as follows:

- **24 CFR 5** General HUD Program Requirements; Waivers
- **24 CFR 982** Section 8 Tenant-Based Assistance: Housing Choice Voucher (HCV) Program
- **24 CFR 983** Project-Based Voucher (PBV) Program
- **24 CFR 984** Section 8 and Public Housing Family Self-Sufficiency Programs

Throughout this plan, AHFC utilizes the term "family" to denote applicants and participants. A family may consist of a single individual. AHFC uses the term family in order to correspond with HUD's definition of family for purposes of eligibility. See the Qualify as a Family exhibit for additional definitions related to family.

### **1. Moving to Work Authority**

Alaska Housing Finance Corporation is a Public Housing Authority participating in the Moving to Work Demonstration Program created in Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996. AHFC's Moving to Work Agreement is dated June 24, 2008 ends on June 30, 2018. As a Moving to Work Agency, AHFC has the flexibility to design and test various approaches for providing and administering housing assistance that:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures;
2. Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational, or other programs that assist in obtaining employment and becoming economically self-sufficient; and
3. Increase housing choices for low-income families.

Moving to Work agencies are permitted to request exemptions from provisions of the 1937 Housing Act as well as its implementing regulations. These agencies may also combine funds appropriated under sections 8 and 9 of the 1937 Housing Act. AHFC will annotate throughout this policy where such exemptions have been applied.

## **2. Administrative Plan Programs**

The following programs provide rental assistance and are largely governed by this Administrative Plan.

- Moving to Work Programs;
- Specialty or Set Aside Programs;
- Project-Based Vouchers (PBV) Programs;
- Traditional Program vouchers or coupons.

The calculation method, minimum rent, and time limits for each of the groups below are specified in the Examinations and Interviews chapter.

### **2.A Moving to Work Programs**

Families in the Moving to Work voucher programs are divided into two groups: Step and Classic.

#### **2.A.1. Classic Program**

All adult family members are at least 62 years of age or a person with a disability. These families may include minors, dependent full-time students under the age of 24, and persons residing with the family as live-in aides.

#### **2.A.2. Step Program**

All families that cannot meet the Classic Program definition are placed in this category. These are families that contain a work-able adult.

### **2.B Specialty or Set Aside Programs**

Families in these voucher programs have unique eligibility or participation rules based on their program requirements. Rules for each voucher type are described in the Special Programs chapter and its exhibits.

### **2.C Project-Based Voucher Programs**

These families receive rental assistance at a development that may be operated through a partnership with AHFC. These can be found in the Project-Based Vouchers chapter and exhibits.

### **2.D Traditional Program**

These are vouchers or coupons that follow traditional income calculation methodologies. Rules for each voucher or coupon type are described in the Special Programs chapter and its exhibits.

### **3. Financial Literacy Requirement**

#### **AHFC Policy**

Families in the Step Program will be required to complete a financial literacy course in the first year of rental assistance. This requirement was approved under Moving to Work Activity 2014-1 Reasonable Rent and Family Self-Sufficiency by the AHFC Board of Directors on February 27, 2013. See the Financial Literacy Requirement exhibit for the requirement, course choices available to families, and the grace period.

### **4. Family Self-Sufficiency**

AHFC administers a family self-sufficiency program for its Public Housing and Housing Choice Voucher families.

#### **AHFC Policy**

Under Moving to Work Activity 2014-1 Reasonable Rent and Family Self-Sufficiency approved by the AHFC Board of Directors on February 27, 2013, AHFC has designed a program designed to help work-able families achieve financial independence. See the Jumpstart Action Plan.

### **5. 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.

### **6. 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 are available at AHFC offices.

AHFC provides a copy of the Housing Discrimination Complaint (form HUD-903) in each briefing packet and at any time upon request by the family. AHFC will assist the family in completing the form, if requested, and will provide them with the address of the nearest HUD Office of Fair Housing and Equal Opportunity.

AHFC's Fair Housing Statement is included on each application. AHFC also posts, 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

### **6.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 will ensure that all applicants/participants are aware of the opportunity to request reasonable accommodations (see the Reasonable Accommodation exhibit). 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.

### **6.B Marketing Plan**

AHFC markets its rental assistance programs to reach both eligible families and landlords of rental housing units. Outreach efforts take into consideration applicants with special needs, families who are least likely to apply, and other eligible families. To encourage a wide range of landlord participation, AHFC conducts outreach to landlords, agents, real estate organizations, and property management firms. Such efforts will include mailers, telephone calls, advertising through public media, and conducting briefing classes with landlords.

### **6.C Limited English Proficiency (LEP) Plan**

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 Flashcard, 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.

#### **6.D AHFC Facilities**

Newly constructed non-housing facilities (24 CFR 8.21) shall be designed to be readily accessible to and usable by people with disabilities. Alterations to existing facilities shall be accessible to the maximum extent feasible, where "feasible" is defined as not imposing an undue financial and administrative burden on the operations of an AHFC program or activity.

For existing non-housing facilities, AHFC shall operate each program or activity receiving federal financial assistance so that the program or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.

### **7. Public Housing Division Responsibilities**

AHFC will comply with the consolidated ACC, all applications submitted to HUD for receipt of voucher assistance, HUD regulations and Public and Indian Housing Notices, the AHFC Moving-to-Work Agreement with HUD, and this Administrative Plan. In administering the program, AHFC will:

1. Publish and disseminate information about the availability and nature of housing assistance under the program;
2. Explain the program to landlords and families;
3. Affirmatively further fair housing goals and comply with equal opportunity requirements;
4. Make efforts to help people with disabilities find satisfactory housing;

5. Seek expanded opportunities for assisted families to locate housing outside areas of poverty or racial concentration;
6. Encourage landlords to make units available for leasing in the program, including landlords of suitable units located outside areas of poverty or racial concentration;
7. Screen all family members and deny assistance according to policy;
8. Receive applications from families, determine eligibility, maintain the waiting list, select applicants, issue a housing choice voucher to each eligible family, and provide housing information to families;
9. Determine who can live in the assisted unit at admission and during the family's participation in the program;
10. Obtain and verify evidence of citizenship and eligible immigration status in accordance with 24 CFR 5;
11. Establish a subsidy standard that determines the number of bedrooms needed for families of different size or composition;
12. Review the family's request for approval of the tenancy and the landlord lease, including the HUD-prescribed tenancy addendum;
13. Determine the maximum rent to the landlord and whether the rent is reasonable;
14. Inspect the unit before the assisted occupancy begins and in accordance with inspection requirements set forth in the Housing Quality Standards Inspections chapter;
15. Determine the portions of rent paid by the family and AHFC;
16. Make timely housing assistance payments to a landlord in accordance with the HAP contract;
17. Examine and verify family income, size, and composition at admission and in accordance with regular examination requirements set forth in Chapters 4 and 11;
18. Establish and adjust the utility allowance;
19. Establish and adjust the payment standard;
20. Administer and enforce the housing assistance payments contract with landlords;
21. Determine whether to terminate assistance to a family for violation of family obligations;
22. Provide informal review procedures for certain decisions concerning applicants;
23. Provide informal hearing procedures for certain decisions concerning participants;
24. Provide sound financial management of the program, including oversight by an independent public accountant to conduct audits; and
25. Administer a Family Self Sufficiency (FSS) program.

## 8. Jurisdiction

AHFC encourages families to select approvable units within the jurisdiction of each office location. Families are advised that they may select a single-family unit, apartment, or mobile home. Each geographical area is generally no more than 50 road miles from the local field office. AHFC Housing Choice Vouchers may be used in the following areas:

- **Anchorage:** the Municipality of Anchorage, including Girdwood and Eklutna
- **Fairbanks:** city of Fairbanks, North Star Borough, cities of North Pole, Fox, and Ester
- **Homer:** city of Homer to the end of East End Road, Anchor Point, Happy Valley, Ninilchik, and south of mile 133 (welcome to Ninilchik sign) of the Sterling Highway
- **Juneau:** city and Borough of Juneau
- **Ketchikan:** Ketchikan Gateway Borough, North and South Tongass
- **Kodiak:** city of Kodiak, including Bells Flats out to Three Sisters
- **Mat-Su:** Palmer, Wasilla, Sutton, Big Lake, Butte, Houston, Willow, and the Sunshine Senior Village at mile 98.3 of the Parks Highway
- **Petersburg:** city of Petersburg
- **Sitka:** city of Sitka
- **Soldotna:** Soldotna, Sterling, Kenai, North Kenai, Nikiski, Kasilof, north of mile 133 (welcome to Ninilchik sign) of the Sterling Highway, and Cooper Landing's Senior Haven at 37325 & 37395 Snug Harbor Road.
- **Valdez:** city of Valdez
- **Wrangell:** city of Wrangell

## 9. Privacy Act and Confidentiality of Records

Families, applicants, or the public may request copies of documentation or policies from AHFC. See the Information Requests exhibit for types of information requests, releases of information, and documentation fees.

## 10. Utility Allowance Schedules

At least annually, AHFC will obtain and analyze utility rate data for all utility providers in the local jurisdiction. AHFC will then determine whether a change of ten percent or more has occurred in the respective utility costs since the last revision of the Utility Allowance Schedule. If so, AHFC will make the appropriate adjustment to the *Allowances for Tenant Furnished Utilities and Other Services* (form HUD-52667). No adjustment will be made for any increase calculated to be less than \$1 per unit month.

## 11. Payment Standards

### HUD Regulation 24 CFR 982.503

Payment standard schedule.

1. HUD publishes the fair market rents for each market area in the United States (see part 888 of this title). The PHA must adopt a payment standard schedule that establishes voucher payment standard amounts for each FMR area in the PHA jurisdiction. For each FMR area, the PHA must establish payment standard amounts for each "unit size." Unit size is measured by number of bedrooms (zero-bedroom, one-bedroom, and so on).
2. The payment standard amounts on the PHA schedule are used to calculate the monthly housing assistance payment for a family (§ 982.505).
3. The PHA voucher payment standard schedule shall establish a single payment standard amount for each unit size. For each unit size, the PHA may establish a single payment standard amount for the whole FMR area, or may establish a separate payment standard amount for each designated part of the FMR area.

Establishing payment standard amounts.

4.
  - (i) The PHA may establish the payment standard amount for a unit size at any level between 90 percent and 110 percent of the published FMR for that unit size. HUD approval is not required to establish a payment standard amount in that range ("basic range").
  - (ii) The PHA may establish a separate payment standard amount within the basic range for a designated part of an FMR area.
5. The PHA must request HUD approval to establish a payment standard amount that is higher or lower than the basic range. HUD has sole discretion to grant or deny approval of a higher or lower payment standard amount. Paragraphs (c) and (e) of this section describe the requirements for approval of a higher payment standard amount ("exception payment standard amount").

### HUD Regulation 24 CFR 982.54

Administrative Plan. (23) Policies concerning application of Small Area FMRs to project-based voucher units (see § 888.113(h))

### **AHFC Policy**

Under Moving to Work Activity 2011-2 approved by the AHFC Board of Directors on August 21, 2013 with Resolution 13-32, AHFC will develop its own payment standards that are tied to local market conditions, not the fair market rent.

AHFC will set its payment standards within 15 percent of the Department of Labor Rental Market Survey rate. The Public Housing Division Director may waive this limitation based on local market events or circumstances on an individual basis.

Small Area FMRs do not apply to any AHFC geographic jurisdiction.

### **11.A Payment Standard Application**

Upon admission, families will be attached to the current payment standard based on the subsidy level of the family or the unit size leased, whichever is less.

#### **11.A.1. Step Program**

Based on the payment standard of the unit, Step Program families will be provided with a five-year schedule. It is expected that the family will remain on that schedule until the rental assistance period terminates at the end of Year Five.

#### **11.A.2. Classic, Set Aside, and Traditional Programs**

Upon admission, families are attached to a payment standard schedule. Families receive subsidy based on the family's annual income, the family's maximum contribution, and the gross rent of the unit.

### **11.B Payment Standard Adjustments**

Local payment standards will be monitored on an annual basis. AHFC may consider the following factors.

- The number of newly admitted families paying more than 40 percent of their gross monthly income for rent and utilities;
- The success rate of shoppers within the last 6 months (do at least 75 percent of families secure housing);
- Fair market rents for a jurisdiction and particular bedroom sizes;
- Rent survey data from the State of Alaska Department of Labor and AHFC's Planning & Program Development Department;
- The size of the local rental market;
- Local rental ad information; and
- Local Unassisted Unit Comparability Survey data

### **11.B.1. Classic Program**

Classic Program families will have the revised payment standard schedule applied at their next regular examination or earlier if determined by AHFC. If any community experiences a change in the local market rents exceeding five percent (5%), AHFC may choose to adjust the payment standard for the appropriate bedroom sizes.

### **11.B.2. Step Program**

If any community experiences a change of more than 20 percent (20%) in a three-year period, AHFC shall apply a revised payment standard schedule to the family.

#### **Example: Payment Standard Revision for Step Program Families**

1. Cloverbrook is admitted in June 2014 under a FY2014 schedule with a payment standard of \$800.
2. In FY2015, Cloverbrook's rental market experiences a four percent increase from the previous year.  
Cloverbrook will remain on the FY2014 schedule.
3. In FY2016, Cloverbrook's rental market experiences an increase of 12 percent.
  - a. Central Office releases a revised set of payment standards.
  - b. Cloverbrook will remain on the FY2014 schedule.
4. In FY2017, Cloverbrook's rental market experiences an increase of six percent.
  - a. Central Office releases a revised set of payment standards.
  - b. Cloverbrook will be placed on the FY2017 schedule.

### **11.B.3. Set Aside and Traditional Programs**

These families will be eligible for the revised payment standard schedule at their next regular examination.

### **11.B.4. Changes to Family Composition or Unit Size**

See the Examinations and Interviews chapter to apply the correct payment standard for family composition changes or changes in unit size.

## **12. Quality Assurance**

AHFC has developed a quality assurance policy and procedure. See the Quality Assurance chapter.

## **13. Code of Conduct and Ethical Standards**

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

**Numbered Memo**

20-18 Exhibit 1-3 Information Requests, Exhibit 1-4, and Chapter 1