
Public Housing Division

Family Self-Sufficiency Action Plan Jumpstart Program

Public Notice: June 19, 2015
Public Hearing: July 9, 2015
Resident Advisory Board: July 15, 2015
Public Comment Closes: July 20, 2015, Noon
AHFC Board of Directors: July 29, 2015

This Page Intentionally Left Blank

Table of Contents

1.	Overview	5
1.A	Regulatory Authority	5
1.B	Use of Term “Family”	5
1.C	Moving to Work Authority.....	5
	1. Moving to Work Designations	6
	2. Family Self-Sufficiency Program	7
1.D	Plan Content	8
1.E	Waiver of Requirements	9
1.F	Fair Housing and Equal Opportunity.....	9
	1. Reasonable Accommodation.....	9
	2. Outreach [24 CFR 984.201(d)(6)].....	9
	3. Limited English Proficiency (LEP) Plan	9
1.G	Confidentiality of Records.....	10
2.	Program Coordinating Committee	10
3.	Jumpstart Overview	11
3.A	Measures of Success (24 CFR 984.102)	11
3.B	Minimum Program Size	12
3.C	Family Demographics [24 CFR 984.201(d)(1)]	12
3.D	Estimate of Participating Families [24 CFR 984.201(d)(2)].....	13
3.E	Families in Other Self-Sufficiency Programs [24 CFR 984.201(d)(3) and 24 CFR 984.201(d)(12)].....	13
3.F	Service Level Determination	13
3.G	Activities and Supportive Services (24 CFR 984.103)	14
	1. Referrals.....	14
	2. AHFC Case Management Referrals and Services	14
3.H	Implementation Time Table [24 CFR 984.201(d)(11)]	15
4.	Family Selection	15
5.	Program Implementation (24 CFR 984.301)	16
5.A	Existing FSS Participants.....	16
5.B	New Housing Admissions After October 1, 2015	16
5.C	Housing Participants Prior to October 1, 2015.....	17
5.D	Assurance of Non-Interference with Rights of Non-Participating Families (24 CFR 984.201)	17
6.	Contract of Participation	17
6.A	Agreement Content [24 CFR 984.303(b)]	17
6.B	Execution.....	18
6.C	Term	18
6.D	“Suitable Employment”	19

6.E	Extension	19
6.F	Modification [24 CFR 984.303(f)]	19
6.G	Consequences of Noncompliance [24 CFR 984.303(d)(5)].....	20
6.H	Inactivity.....	20
6.I	Moving Between Levels.....	20
6.J	Completion.....	21
6.K	Termination [24 CFR 984.303(h)]	21
6.L	Unavailability of Supportive Services [24 CFR 984.303(e)].....	22
7.	Incentive Eligibility Agreement	23
8.	Total Tenant Payment	23
9.	FSS Account.....	23
10.	Jumpstart Incentives [24 CFR 984.201(d)(5)].....	24
10.A	Maximum Incentive.....	24
10.B	Work Incentives	24
	1. Initial Employment.....	24
	2. Sustained Employment.....	24
10.C	Educational Incentives and Rewards.....	24
	1. Tuition Assistance.....	24
	2. Educational Rewards.....	25
10.D	Long-Term Financial Incentives	25
10.E	Incentives and Family Debt.....	26
11.	Residency and Portability Requirements	26
12.	Transfer Between AHFC Jurisdictions.....	26
13.	Grievance Procedures	27
14.	Reporting Requirements (24 CFR 984.401)	27
14.A	50058 Reporting.....	27
14.B	Moving to Work Reporting.....	27

1. Overview

This Family Self-Sufficiency Action Plan (hereinafter called “Plan”) has been prepared by the Alaska Housing Finance Corporation (AHFC) in conformance with the requirements of 24 CFR 984.201. 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 Division Moving to Work Plan.

1.A Regulatory Authority

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

- **24 CFR 5** General HUD Program Requirements; Waivers
- **24 CFR 960** Admission to, and Occupancy of, Public Housing
- **24 CFR 966** Public Housing Lease and Grievance Procedure
- **24 CFR 982** Section 8 Tenant-Based Assistance: Housing Choice Voucher Program
- **24 CFR 984** Section 8 and Public Housing Family Self-Sufficiency Programs

1.B Use of Term “Family”

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 Exhibit 2-1 of the Housing Choice Voucher Administrative Plan or the Public Housing Admissions and Occupancy Policy for additional definitions related to family.

1.C Moving to Work Authority

Alaska Housing Finance Corporation is a Public Housing Authority participating in the Moving to Work (MTW) 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:

- Reduce cost and achieve greater cost effectiveness in federal expenditures;
- 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
- 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.

Exemptions from current HUD regulations and the corresponding AHFC Moving to Work policy are shown in boxes throughout this policy.

In February 2013, the AHFC Board of Directors approved AHFC's FY2014 MTW Annual Plan which contained Activity 2014-1 Reasonable Rent and Family Self-Sufficiency, commonly called Rent Reform. Activity 2014-1d Jumpstart Program outlines AHFC's family self-sufficiency activity as well as required waivers.

1. Moving to Work Designations

Under Rent Reform, Jumpstart-eligible families are divided into three classifications:

a. Classic Program

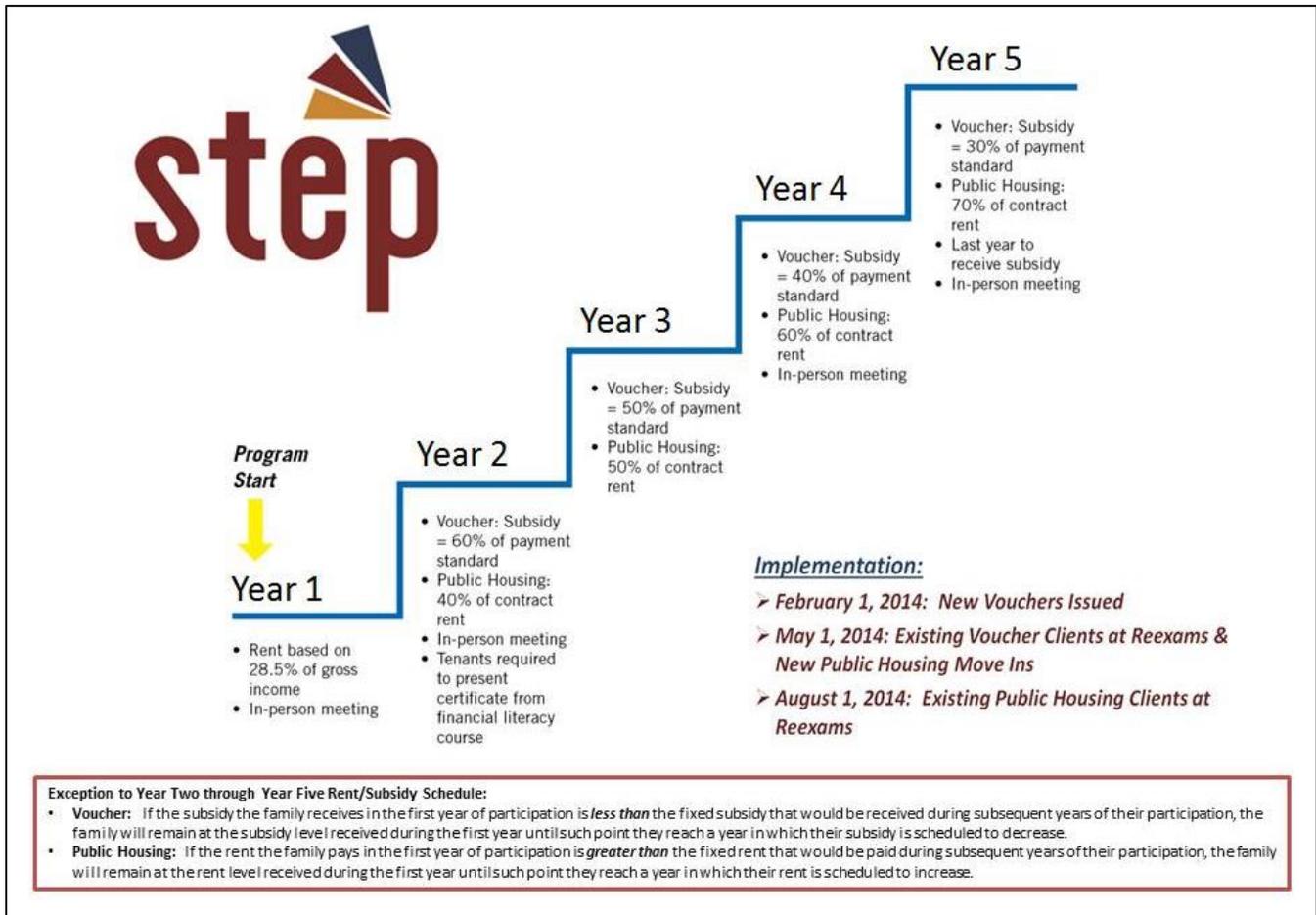
All adult family members are at least 62 years of age or a person with a disability. These families may include minors, dependent full-time students under the age of 24, and persons residing with the family as live-in aides.

These families pay an income-based rent (28.5 percent of monthly income) and have no time-limits on assistance.

b. Step Program

All families that do not meet the Classic Program definition will be placed in this category. These families contain a work-able adult.

These families pay rent based on income the first year. During years 2 through 5, rent is based on a percentage of the payment standard (voucher) or contract rent (public housing) of the unit. Under the Step Rent/Subsidy schedule, each year the family's share of rent increases as AHFC's subsidy decreases. Under the Step program, families are limited to five (5) years of assistance. See graphic below.



c. Set-Aside Program

These families meet specific criteria targeting them for assistance in cooperation with services provided by other State services or social service providers.

These families pay an income-based rent (28.5 percent of monthly income) and some have time limits on their rental assistance.

2. Family Self-Sufficiency Program

AHFC has operated a Family Self-Sufficiency Program since 1994, and this Action Plan expands and improves its current program. Activity 2014-1d was amended in AHFC's FY2016 MTW Annual Plan with Amendment 1 submitted to HUD on July XX, 2015.

HUD Regulations (24 CFR 984.103)

Family Self-Sufficiency (FSS) program means the program established by a PHA within its jurisdiction to promote self-sufficiency among participating families, including the provision of supportive services to these families, as authorized by section 23 of the 1937 Act.

AHFC MTW Policy

AHFC has named their FSS program Jumpstart. AHFC has established a shelter burden calculation to determine family need for services under Jumpstart. Shelter burden is defined as the family's rent portion and utility allowance as a percentage of family monthly income. AHFC has established two service levels to better meet the needs of low-income families, Level 1 and Level 2.

1. Jumpstart Level 1

This level contains financial incentives for participation and/or completion of employment, education, and long-term financial activities along with intensive case management. This program will be managed by AHFC Jumpstart staff and includes frequent monitoring of family goals and activities.

Using the shelter burden calculation, Step Program families with the greatest need (shelter burden above 50 percent) will be automatically enrolled in this level.

2. Jumpstart Level 2

This level contains financial incentives for participation and/or completion of employment, education, and long-term financial activities. This program will be managed by the family's local AHFC housing representative with limited case management.

1.D Plan Content

This Action Plan contains the following required sections:

- Family Demographics
- Estimate of Participating Families
- Eligible Families from Other Self-Sufficiency Programs
- Family Selection Procedures
- Incentives to Encourage Participation
- Outreach Efforts
- Activities and Supportive Services
- Method for Identification of Family Support Needs
- Program Termination, Withholding of Services, and Available Grievance Procedures
- Assurances of Non-Interference with Rights of Non-Participating Families
- Timetable for Program Implementation

- Certification of Coordination
- Other Information

1.E Waiver of Requirements

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

1.F Fair Housing and Equal Opportunity

AHFC Fair Housing Statement

“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.”

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 the 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 (HUD-928.1A) is posted at each AHFC office site.

1. Reasonable Accommodation

Because disabilities are not always apparent, AHFC will ensure that all families are aware of the opportunity to request reasonable accommodations. Guidelines for granting a Reasonable Accommodation are in Exhibit 1-1 of the Housing Choice Voucher Administrative Plan and the Public Housing Admissions & Occupancy Policy.

2. Outreach [24 CFR 984.201(d)(6)]

AHFC will make every reasonable effort to attract families who are representative of the total eligible population to enable it to achieve selection goals specified in this Plan. Outreach efforts take into consideration applicants with special needs, families who are least likely to apply, and other eligible families. All Moving to Work families will receive written notification of the ability to participate in Jumpstart.

3. Limited English Proficiency (LEP) Plan

AHFC is committed to ensuring that Limited English Proficient (LEP) individuals have meaningful access to 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:

- a. AHFC will use the *Census Bureau Language Identification Flashcard*, whenever necessary, to identify the language spoken by the LEP customer. See Exhibit 1-2 of each policy manual.
- b. AHFC 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.
- c. 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.
- d. 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.

1.G Confidentiality of Records

It is the policy of AHFC to facilitate the full exercise of rights conferred on individuals pursuant to Article I, Section 22 of the Alaska Constitution, and to insure the protection of privacy of individuals about whom AHFC maintains records under housing assistance programs it administers. See the Housing Choice Voucher Administrative Plan or the Public Housing Admissions and Occupancy Policy for a full description of AHFC confidentiality protections.

2. Program Coordinating Committee

HUD Regulations (24 CFR 984.202)

Each participating PHA must establish a PCC whose functions will be to assist the PHA in securing commitments of public and private resources for the operation of the FSS program within the PHA's jurisdiction, including assistance in developing the Action Plan and in implementing the program. Membership shall consist of the following:

- Representatives of the PHA.
- For a public housing FSS program, residents of public housing.
- For a Section 8 FSS program, residents assisted under the Section 8 program.

AHFC MTW Policy

Development of this Plan consisted of PHA representatives from the public housing and Section 8 voucher programs as well as current FSS program staff. Members of AHFC's Resident Advisory Board provided comment for this Plan. The following organizations provided input and advice to the development of this Plan:

- Center for Community, Juneau
- Cook Inlet Tribal Council
- Housing authorities - Delaware, Portland, San Bernardino, San Mateo, Tacoma
- State of Alaska Department of Labor - Job Center assistant director, career support and training, Wasilla office manager, and Juneau office manager
- State of Alaska Division of Public Assistance
- State of Alaska Division of Vocational Rehabilitation - chief of vocational rehabilitation services
- University of Alaska Anchorage, Continuing Education
- University of Alaska Anchorage, Institute of Social and Economic Research

AHFC shall establish a Jumpstart Coordinating Committee consisting of representatives from AHFC as well as representatives from the Alaskan communities served by AHFC's public housing and housing choice voucher programs.

3. Jumpstart Overview

HUD Regulations (24 CFR 984.103)

Self-sufficiency means that an FSS family is no longer receiving Section 8 or public or Indian housing assistance, or any federal, state, or local rent or homeownership subsidies or welfare assistance.

AHFC MTW Policy

Under Jumpstart, AHFC defines self-sufficiency as "a family is able to rent a private market unit with a shelter burden of less than 50 percent of monthly income."

3.A Measures of Success (24 CFR 984.102)

The objective of Jumpstart is to reduce the dependency of low-income families on welfare assistance and on Housing Choice Voucher, Public Housing, or any federal, state, or local rent or homeownership subsidies. AHFC will measure the success of Jumpstart not only by the number of families who achieve self-sufficiency, but also by the number of Jumpstart families who, as a result of participation in the program:

- Have family members who obtain their first job;
- Have family members who obtain higher paying jobs;
- No longer need benefits received under one or more welfare programs;

- Obtain a high school diploma, General Educational Development (G.E.D.) certificate, or higher education degree; or
- Accomplish goals that assist the family in obtaining economic independence.

3.B Minimum Program Size

HUD Regulations (24 CFR 984.105)

In the FY2009 AHFC FSS Action Plan, AHFC certified that it had met its requirement for a mandatory minimum program size as its graduation rate exceeded the HUD mandated program size. The plan was approved by HUD, and the mandatory requirement ended on September 30, 2006. From that point, AHFC operated a voluntary FSS Program.

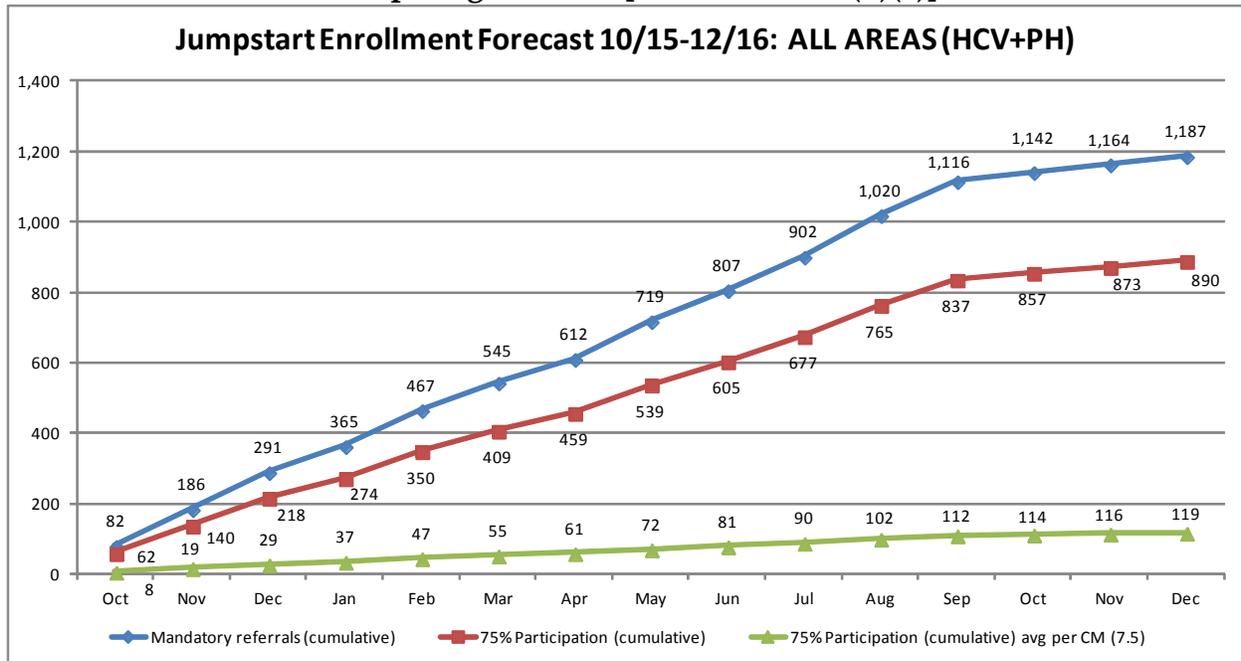
AHFC MTW Policy

Jumpstart will be available to all families participating in its Public Housing and Housing Choice Voucher Programs.

3.C Family Demographics [24 CFR 984.201(d)(1)]

	Voucher	Public	Total	% Total
Total Step Program Families	1,762	739	2,501	
Households with Wages (W code only)	711	344	1,055	42.2%
Wages > \$7,750 (20 hrs/wk at \$7.75/hr)	635	300	935	37.4%
Wages > \$15,500 (40 hrs/wk at \$7.75/hr)	429	235	664	26.5%
Wages > \$23,250 (60 hrs/wk at \$7.75/hr)	229	160	389	15.6%
Wages > \$31,000 (80 hrs/wk at \$7.75/hr)	86	101	187	7.5%
Households with Wages (All wage codes*)	748	352	1,100	44.0%
Wages > \$7,750 (20 hrs/wk at \$7.75/hr)	655	304	959	38.3%
Wages > \$15,500 (40 hrs/wk at \$7.75/hr)	431	237	668	26.7%
Wages > \$23,250 (60 hrs/wk at \$7.75/hr)	229	161	390	15.6%
Wages > \$31,000 (80 hrs/wk at \$7.75/hr)	86	101	187	7.5%
<i>*incl. W, fed (F), self-employ. (B), military (M), PHA (HA)</i>				
Households with No Earned Income	1,014	387	1,401	56.0%
TANF (T)	162	73	235	9.4%
TANF (T) and General Assist. (G)	368	125	493	19.7%
Unemployment (U)	156	50	206	8.2%
General assistance (G)	206	52	258	10.3%
Indian Trust (I)	123	75	198	7.9%

3.D Estimate of Participating Families [24 CFR 984.201(d)(2)]



Projection: By the end of 2016, approximately 1,200 Moving to Work families will be automatically enrolled in Jumpstart using the shelter burden calculation and current income.

3.E Families in Other Self-Sufficiency Programs [24 CFR 984.201(d)(3) and 24 CFR 984.201(d)(12)]

AHFC is currently working with the State of Alaska Department of Health and Human Services and the State of Alaska Department of Labor and Workforce Development to develop cooperative agreements that will outline the exchange of family data and relevant services.

3.F Service Level Determination

For Step Program participants, AHFC will determine the appropriate Jumpstart level by calculating shelter burden at their housing program intake, examination, or at the family's request. The following families will receive an automatic enrollment to Jumpstart Level 1.

1. Families with a shelter burden of 50 percent or more within 13 months, or
2. Families with a shelter burden near 50 percent that identify barriers toward achieving economic independence within their five years of participation.

All other eligible families that desire to increase their employment income and work toward economic independence will be offered enrollment in Jumpstart Level 2.

3.G Activities and Supportive Services (24 CFR 984.103)

AHFC recognizes that in order for a family to meet their long-term housing needs, they may require assistance from a variety of resources to become self-sufficient. Local AHFC offices regularly assist families in immediate need by referring them to resources and services. To assist families, AHFC has developed relationships to coordinate resources and compiled a list of statewide government agencies, social service programs, and educational organizations that provide services throughout Alaska. AHFC will utilize local or regional resource lists and the knowledge of AHFC personnel at each office as a guide when referring participants.

1. Referrals

Typical supportive service referrals offered through Jumpstart.

- a. Child Care – child care of a type that provides sufficient hours of operation and serves an appropriate range of ages.
- b. Transportation – transportation necessary to enable a participating family to receive available services, or to commute to their places of employment.
- c. Education – remedial education; high school diploma or equivalent; education for completion of secondary or postsecondary schooling.
- d. Employment – job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the contract of participation.
- e. Personal Welfare – substance/alcohol abuse treatment and counseling and referrals for domestic violence counseling/services.
- f. Household Skills and Management – training in homemaking and parenting skills; household management; and money management.

2. AHFC Case Management Referrals and Services

AHFC will offer the following supportive services and referrals as part of its Jumpstart case management.

- a. Counseling
AHFC case managers will work with families to help them develop individualized goals and then introduce or direct them to resources and support services that can assist in their progress toward meeting these goals. Case managers are able to access resources and guide participants to programs or entities they might not have previously known about or even considered.

b. Other Services

Brochures and flyers developed by various agencies are utilized in AHFC offices with information on a multitude of topics that participants find helpful; i.e., materials from Money Smart; USAA Educational Foundation; Federal Trade Commission; Consumer Federation of America; State of Alaska, Consumer Protection; among many others.

Handout lists of existing local and regional resources are also available at each local AHFC office. AHFC newsletters, brochures, orientations, and briefings routinely contain information promoting the benefits of the self-sufficiency program to public housing and voucher participants.

3.H Implementation Time Table [24 CFR 984.201(d)(11)]

The following is the suggested implementation timeline.

- Staff training for the new Jumpstart program will be conducted during the Public Housing Division’s annual workshop in September 2015.
- Written notification to all current FSS program participants and Moving to Work program participants will be sent in August 2015.
- Beginning October 1, 2015, all families participating in Moving to Work rental assistance will be eligible to enroll in Jumpstart. At regular examinations, each family’s shelter burden will be assessed. Families will either be automatically enrolled in Level 1 or provided written information and reminded of the opportunity to enroll in Level 2.

4. Family Selection

Any participant family in the Housing Choice Voucher or Public Housing program is eligible for Jumpstart at any time during their rental assistance participation. If a family is receiving services through the State of Alaska Department of Health and Human Services or Department of Labor, AHFC will coordinate with that agency to prevent duplication of services.

HUD Regulations (24 CFR 984.203)

A PHA has the option of giving a selection preference for up to 50 percent of its public housing FSS Slots and of its Section 8 FSS slots respectively to eligible families who have one or more family members currently enrolled in an FSS related service program or on the waiting list for such a program.

AHFC MTW Policy

Jumpstart Level 1 will automatically enroll families with the following needs first.

1. Step Program families with a shelter burden greater than 50 percent at the time of application.
2. Step Program families with a shelter burden greater than 50 percent within 13 months of their most recent examination.
3. Step Program families with a shelter burden near 50 percent who have identified barriers to achieving economic independence within their five years of participation.

If Jumpstart case management staff can accommodate additional families, enrollment into Level 1 will be prioritized as follows.

1. Moving to Work families paying AHFC minimum rent.
2. Step Program families with a shelter burden greater than 50 percent within 25 months of their most recent examination.
3. Step Program families with a shelter burden greater than 50 percent within 37 months of their most recent examination.
4. Step Program families with a shelter burden greater than 50 percent within 49 months of their most recent examination.

All Moving to Work families not automatically enrolled in Level 1 are eligible to enroll in Jumpstart Level 2.

5. Program Implementation (24 CFR 984.301)

As stated in section 3.C above, the Jumpstart Program is a voluntary program. AHFC has developed the following plan to transition existing FSS Program participants and existing and new Moving to Work families.

5.A Existing FSS Participants

All existing FSS Program participants will be given the opportunity to enroll in Jumpstart. AHFC will send written notification to these families with suggested enrollment in the Level 1 or Level 2 program.

5.B New Housing Admissions After October 1, 2015

AHFC will offer the Jumpstart program to every new admission to the public housing and housing choice voucher program in writing.

5.C Housing Participants Prior to October 1, 2015

AHFC will offer the Jumpstart program to every current participant family in the public housing and housing choice voucher program. A written notification will be sent to all families announcing the Jumpstart program as well as a reminder given at the families' next regular examination.

5.D Assurance of Non-Interference with Rights of Non-Participating Families (24 CFR 984.201)

A family's election not to participate in Jumpstart will not affect the family's admission to public housing or to the Section 8 program or the family's right to occupancy in accordance with its lease.

6. Contract of Participation

HUD Regulations (24 CFR 984.303)

Each family that is selected to participate in an FSS program must enter into a contract of participation with the PHA that operates the FSS program in which the family will participate. The contract of participation shall be signed by the head of the FSS family.

AHFC MTW Policy

Using the HUD Program Contract of Participation (HUD-52650), AHFC has developed its own Jumpstart Participation Agreement (hereinafter "Agreement") in order to incorporate its Moving to Work flexibility. This Agreement shall be signed by the head of household for all Jumpstart Level 1 participants.

For Jumpstart Level 2 participants, the head of household will sign the Jumpstart Incentive Eligibility Agreement.

6.A Agreement Content [24 CFR 984.303(b)]

The Agreement between AHFC and the family shall contain the following:

1. Principal terms and conditions governing participation in Jumpstart
2. Agreement term
3. Names of each adult in the family that elects to participate
4. Rights and responsibilities of the family
 - a. Statement that head of family is required to seek and maintain "suitable" employment during the term of the Agreement (and any extension)
 - b. Statement that family must continue to comply with public housing or Section 8 lease terms

HUD Regulations [24 CFR 984.303(b)(2)]

For each participating FSS family that is a recipient of welfare assistance, the PHA must establish as an interim goal that the family become independent from welfare assistance and remain independent from welfare assistance at least one year before the expiration of the term of the contract of participation, including any extension thereof.

AHFC MTW Policy

AHFC chooses to waive this requirement as a condition of fulfilling a Jumpstart Agreement.

5. Rights and responsibilities of AHFC
6. Individual training and services plan (ITSP)
 - a. Services to be provided
 - b. Activities to be completed
 - c. Interim and final goals of the family
7. Consequences of noncompliance

6.B Execution

HUD Regulations [24 CFR 984.303(a)]

The contract of participation shall be signed by the head of the FSS family.

AHFC MTW Policy

The Agreement shall be signed by the family head of household. If the family head ends his/her rental assistance during the term of the Agreement, the remaining adult family members may designate a new head and complete the term of the Agreement. An amendment to the Agreement will be signed and dated by the new head and AHFC. AHFC and the newly designated family head will determine any need for revision of the ITSP.

6.C Term

HUD Regulations [24 CFR 984.303(c)]

The contract of participation shall provide that each FSS family will be required to fulfill those obligations to which the participating family has committed itself under the contract of participation no later than 5 years after the effective date of the contract.

AHFC MTW Policy

The Agreement term will coincide with the Step Program subsidized housing term. For families not in the Step Program, the term shall be five (5) years.

6.D “Suitable Employment”

HUD Regulations [24 CFR 984.303(b)(4)]

The head of the FSS family shall be required under the contract of participation to seek and maintain suitable employment during the term of the contract and any extension thereof. Although other members of the FSS family may seek and maintain employment during the term of the contract, only the head of the FSS family is required to seek and maintain suitable employment.

Seek employment. The obligation to seek employment means that the head of the FSS family has applied for employment, attended job interviews, and has otherwise followed through on employment opportunities.

Determination of suitable employment. A determination of suitable employment shall be made by the PHA based on the skills, education, and job training of the individual that has been designated the head of the FSS family, and based on the available job opportunities within the jurisdiction served by the PHA.

AHFC MTW Policy

Any adult family member named on the Agreement can fulfill this requirement.

6.E Extension

HUD Regulations [24 CFR 984.303(d)]

The PHA shall, in writing, extend the term of the contract of participation for a period not to exceed two years for any FSS family that requests, in writing, an extension of the contract, provided that the PHA finds that good cause exists for granting the extension. The family’s written request for an extension must include a description of the need for the extension. As used in this paragraph, “good cause” means circumstances beyond the control of the FSS family, as determined by the PHA, such as a serious illness or involuntary loss of employment.

AHFC MTW Policy

AHFC may extend an Agreement term upon written request by the family and at the discretion of AHFC Jumpstart staff for up to two years. If the Bridge Committee authorizes an extension to the participation of the housing assistance program, participation in the Jumpstart program may also be extended.

6.F Modification [24 CFR 984.303(f)]

AHFC and the FSS family may mutually agree to modify the contract of participation. The contract of participation may be modified in writing with respect to the individual training and services plans, the contract term, and designation of the head of the family. All modifications will be made in writing with a copy of any modification provided to the family.

6.G Consequences of Noncompliance [24 CFR 984.303(d)(5)]

The Agreement shall specify that if the family fails to comply, without good cause, with the terms and conditions of the Agreement, AHFC may:

1. Withhold the supportive services;
2. Terminate the family's participation; or

HUD Regulations [24 CFR 984.303(d)(5)(iii)]

For the Section 8 program, terminate or withhold the family's Section 8 assistance, except in the case where the only basis for noncompliance with the Agreement is noncompliance with the lease, or failure to become independent from welfare assistance. However, failure to become independent from welfare assistance because of failure of the head of household to meet the employment obligation described in section Suitable Employment above, or failure of the family to meet any other obligation under the Agreement, except the interim goal concerning welfare assistance, is grounds for AHFC to terminate or withhold Section 8 assistance.

AHFC MTW Policy

AHFC will not terminate a family's rental assistance for failure to comply with their Agreement. A family in noncompliance with their Agreement will not be eligible for incentives.

6.H Inactivity

A family will be considered inactive if they fail to maintain contact, attend appointments, or respond to contact from AHFC. A family will also be considered inactive if they fail to meet specific milestones or goals in a timely manner. AHFC will notify a family in writing before placing them in inactive status.

- Inactive families are not eligible for incentive payments.
- Previously inactive participants must renew their ITSP and be compliant for 90 days before being eligible to receive a financial incentive.

6.I Moving Between Levels

Families that withdraw from Level 1 will not be eligible to receive incentives unless they demonstrate an increase in income which adjusts their shelter burden to less than 50 percent of their income for the next 13 months, and they comply with the enrollment requirements of Level 2.

6.J Completion

HUD Regulations [24 CFR 984.303(g)]

The contract of participation is considered to be completed, and a family's participation in the FSS program is considered to be concluded when one of the following occurs::

- a. The FSS family has fulfilled all of its obligations under the contract of participation on or before the expiration of the contract term, including any extension thereof; or
- b. 30 percent of the monthly adjusted income of the FSS family equals or exceeds the published existing housing fair market rent for the size of the unit for which the FSS family qualifies based on the PHA's occupancy standards. The contract of participation will be considered completed and the family's participation in the FSS program concluded on this basis even though the contract term, including any extension thereof, has not expired, and the family members who have individual training and services plans have not completed all the activities set forth in their plans.

AHFC MTW Policy

The Agreement is considered complete when:

1. The family has fulfilled all of its obligations under the Agreement on or before the expiration of the Agreement term, including any extension thereof; and
2. Families must be in good standing with AHFC the month they complete the Agreement.

Families will not be eligible to receive the financial long-term incentives until their rental assistance ends.

6.K Termination [24 CFR 984.303(h)]

HUD Regulations [24 CFR 984.303(h)]

Federal Register dated December 29, 2014, FR Doc. 2014-30342 states that a PHA may have a policy that allows a PHA to withhold or terminate HCV or PH assistance for those families that fail to comply with their FSS contracts without good cause. This waiver allows PHAs to establish alternative conditions for compliance before proceeding to termination of rental assistance.

AHFC MTW Policy

AHFC will not terminate a family's rental assistance for failure to comply with their Agreement (see Inactivity section above). A family in noncompliance with their Agreement will not be eligible for incentives.

The Agreement is automatically terminated if the family's public housing or Section 8 assistance is terminated in accordance with HUD requirements. The Agreement may be terminated before the expiration of the contract term, and any extension thereof, by:

1. Mutual consent of the parties;
2. The failure of the family to meet its obligations under the Agreement without good cause, including in the Section 8 program the failure to comply with the contract requirements because the family has moved outside the jurisdiction of AHFC;
3. The family's withdrawal from the program;
4. Such other act as is deemed inconsistent with the purpose of the program; or
5. Operation of law.

AHFC may declare the Agreement null and void:

- if the resources and services necessary to complete the Agreement are not available; or
- if an act occurs that is inconsistent with the purpose of the program; or
- if a change in family circumstances results in the family no longer requiring Level 1 services. The family will be eligible to transfer to Level 2.

Families that terminate their Agreement with AHFC without successfully completing the Agreement are not eligible for any long-term financial incentives.

6.L Unavailability of Supportive Services [24 CFR 984.303(e)]

If a social service agency fails to deliver the supportive services pledged under a family member's individual training and services plan, AHFC shall make a good faith effort to obtain these services from another agency.

If the PHA is unable to obtain the services from another agency, AHFC shall reassess the family member's needs and determine whether other available services would achieve the same purpose. If other available services would not achieve the same purpose, AHFC shall determine whether the unavailable services are integral to the family's advancement or progress toward self-sufficiency. If the unavailable services are:

1. Determined not to be integral to the family's advancement toward self-sufficiency, AHFC shall revise the individual training and services plan to delete these services and modify the Agreement to remove any obligation on the part of the family to accept the unavailable services, in accordance with the Agreement Modification section above; or

2. Determined to be integral to the family's advancement toward self-sufficiency (which may be the case if the affected family member is the family head), AHFC shall declare the Agreement null and void.

7. Incentive Eligibility Agreement

The Jumpstart Incentive Eligibility Agreement shall specify that the family will be automatically transferred to Level 1 if, at a future examination, the family:

1. Has a shelter burden of 50 percent or more within thirteen (13) months, or
2. Has a shelter burden near 50 percent of income and identifies barriers to achieving economic independence within their five (5) years of participation.

8. Total Tenant Payment

HUD Regulations (24 CFR 984.304)

Any increase in the earned income of an FSS family during its participation in an FSS program may not be considered as income or a resource for purposes of eligibility of the FSS family for other benefits, or amount of benefits payable to the FSS family, under any other program administered by HUD, unless the income of the FSS family equals or exceeds 80 percent of the median income of the area (as determined by HUD, with adjustments for smaller and larger families).

AHFC MTW Policy

AHFC's Rent Reform Program discounts increases in earned income between regular examinations. AHFC will calculate family income and total tenant payment as specified in its Housing Choice Voucher Administrative Plan or Public Housing Admissions and Occupancy Policy.

9. FSS Account

HUD Regulations (24 CFR 984.305)

The PHA shall deposit the FSS account funds of all families participating in the PHA's FSS program into a single depository account. The PHA must deposit the FSS account funds in one or more of the HUD-approved investments.

AHFC MTW Policy

AHFC does not offer the FSS Account to Jumpstart families. AHFC has developed an alternate system of financial incentives for employment, education, and long-term financial planning.

10. Jumpstart Incentives [24 CFR 984.201(d)(5)]

Once enrolled, Jumpstart families are eligible for both short and long-term financial incentives as they work toward the goal of being off rental assistance in five years. Financial incentives have been designed to support and encourage each participant's investment in his/her own immediate employment and human capital development for their longer-term economic well-being.

The AHFC CEO/Executive Director or the Public Housing Division Director may waive all or part of these financial incentives if necessary due to limited resources or budgetary constraints.

10.A Maximum Incentive

A participating family can receive a maximum of \$3,000 in Work, Education, and Savings Match Incentives during the term of their Jumpstart program participation.

10.B Work Incentives

Work incentives will be available to families with an adult family member who is verified to be working less than thirty (30) hours a week upon entering the program. Eligible adults will be required to provide appropriate documentation from their employer (paystubs, letter, etc.) to receive this incentive.

1. Initial Employment

To receive this one-time \$250 reward, the eligible family member must obtain and maintain employment averaging at least 30 hours a week for three (3) consecutive months.

2. Sustained Employment

To receive this one-time \$250 reward, the eligible family member must maintain employment averaging a minimum of 30 hours a week for nine total months in a one year period. For self-employment, the individual family member's earnings must equal or exceed the current Alaska minimum wage for 30 hours a week for nine total months in a one year period.

10.C Educational Incentives and Rewards

1. Tuition Assistance

AHFC will provide tuition assistance of up to \$1,000 for a participant's family during the term of their participation. Tuition assistance must be utilized for courses or training programs that support employment opportunities or career advancement of the family. The assistance may be used for tuition, books, or fees associated with the course.

Tuition assistance may be used for courses necessary for a family member to obtain their General Education Diploma (GED). Courses taken must help the family work toward, or reach, an identified goal. Tuition assistance must be repaid if the course is not completed.

Tuition assistance is paid directly to the qualifying institution. In order to qualify, the institution must be recognized by the Alaska Post-Secondary Education Commission. Correspondence courses (not distance courses) will only be considered if the required course is not offered, accessible, or available timely through a school located within the state of Alaska or if the financial assistance is being applied to finishing a program.

2. Educational Rewards

Families providing verification of the completion of courses/training programs that support employment opportunities or career advancement, may earn up to \$500 as a reward for course completion.

- a. GED Completion: \$500 reward.
- b. College Courses/Vocational Training Completion
AHFC will pay up to \$100 per credit/credit equivalent. One credit equivalent is 15 hours of course work (i.e., a 3 hour/3 credit course over a period of 15 weeks would equal a reward of \$300).

10.D Long-Term Financial Incentives

Developing savings habits to meet long-term financial needs is a critical component of self-sufficiency. To support efforts to establish savings and prepare for the end of their participation in housing assistance, AHFC will provide a matched savings incentive to households who participate in the Jumpstart program.

Once households have completed AHFC's required financial literacy course, they will be eligible to enroll in the Savings Match Program. To qualify for the annual savings match, the family must provide verification of funds placed into a savings account. Each subsequent year the verified account balance must document growth of the family's savings by at least the amount to be matched for the year. AHFC will match the household's savings up to \$300 each year for a maximum savings of \$1,500 per participating household. Households will only be eligible to receive the savings match upon successful completion of the Jumpstart program and ending their participation in the AHFC housing assistance program.

10.E Incentives and Family Debt

No incentives or rewards will be paid if a family has an outstanding debt with AHFC. Families may choose to apply an incentive to an outstanding balance. Rewards/incentives will be paid:

- if the participant is current and in good standing under a Tenant Payment Agreement, or
- when the debt is otherwise satisfied.

11. Residency and Portability Requirements

HUD Regulations (24 CFR 984.306)

Regulations pertaining to a “relocating FSS family”, Initial Occupancy, Occupancy after the First 12 Months, Portability of FSS Participation, and Loss of FSS Account are included under this section.

AHFC MTW Policy

Families that move from AHFC’s jurisdiction are not eligible to continue in the Jumpstart program. These Agreements will be terminated.

Families that move into AHFC’s jurisdiction are not eligible to continue prior FSS Program participation. These families are eligible for AHFC’s Jumpstart Program in accordance with Family Selection policies detailed above.

AHFC does not hold an FSS Account for a Jumpstart family (see FSS Account section above); therefore, AHFC will not transfer any balances a family earns under its incentive program to another PHA; AHFC will also not accept any FSS Account balances from another PHA.

Payment of incentives will be conditioned upon eligibility for the incentive while the family was in AHFC’s jurisdiction. AHFC will not allow a family to complete eligibility for a financial incentive while in another PHA’s jurisdiction.

12. Transfer Between AHFC Jurisdictions

A Jumpstart family may move to another AHFC jurisdiction upon proper completion of the Move process (see the Housing Choice Voucher Administrative Plan).

- The initial Agreement will remain in effect at the new location.
- The initial agreement may be modified to meet the family’s new circumstances.
- The transfer may result in assignment of a new Jumpstart case manager.

13. Grievance Procedures

Any adverse action taken by AHFC due to the family's action or inaction is subject to AHFC grievance procedures. See Chapter 9 of the Housing Choice Voucher Administrative Plan or the Public Housing Admissions and Occupancy Policy for the grievance procedure available to the family.

14. Reporting Requirements (24 CFR 984.401)

AHFC shall submit to HUD, in the form prescribed by HUD, a report regarding its Jumpstart program. The report shall include the following information:

1. A description of the activities carried out under the program;
2. A description of the effectiveness of the program in assisting families to achieve economic independence and self-sufficiency;
3. A description of the effectiveness of the program in coordinating resources of communities to assist families to achieve economic independence and self-sufficiency; and
4. Any recommendations by the PHA or the appropriate local program coordinating committee for legislative or administrative action that would improve the FSS program and ensure the effectiveness of the program.

14.A 50058 Reporting

The 50058 MTW-FSS addendum will be updated for enrollment, changes, and termination/completion of the Jumpstart program for each enrolled family. Updates will occur within sixty (60) business days of the change.

14.B Moving to Work Reporting

AHFC will submit data regarding the progress of the Jumpstart program as part of its annual Moving to Work Report process.