

# **Exhibit 11-11**

## **Emergency Housing Voucher (EHV) Program**

Rental assistance for individuals and families who are homeless, at-risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability is authorized under the American Rescue Plan Act (ARPA) of 2021.

AHFC signed a Memorandum of Understanding for the Emergency Housing Voucher Program. AHFC agrees to administer the program and the State of Alaska has two Continuum of Care (CoC) agencies to identify eligible families. For Anchorage the CoC agency is the Anchorage Coalition to End Homeless (ACEH) and for the balance of state the CoC agency is the Alaska Coalition on Housing and Homelessness (AKCH2).

### **1. Voucher Increments**

AHFC received an initial allocation of 194 Emergency Housing Vouchers from the U.S. Department of Housing and Urban Development on July 1, 2021.

The initial allocation of 194 vouchers shall be split between ACEH and AKCH2.

- 100 for Anchorage
- 94 for the balance of the state
- This allocation may be adjusted based on the availability of housing in particular communities, additional increments awarded, and status of Coordinated Entry waiting lists.

#### **1. A Administration**

AHFC will administer EHV vouchers under the same rules as a Moving to Work Set Aside Program Voucher except as described in the sections below. In general,

1. EHV vouchers are issued to ACEH or AKCH2 referrals only.
2. EHV vouchers returned to AHFC must be offered to the next eligible EHV referral until the termination date indicated in Section 9.
3. EHV vouchers have its own monthly budget report as these vouchers have a separate funding stream. These vouchers are in addition to each office's regular voucher allocation.
4. EHV families may transfer to another AHFC voucher area by following AHFC's waivers in Section 8.A.
5. EHV vouchers are eligible for portability out of the state of Alaska by following AHFC's waivers in Section 8.B.
6. These vouchers are reported to HUD. This means staff are required to follow Enterprise Income Verification (EIV) procedures.

## 1.B Moving to Work Agencies

### HUD Guidance

MTW agencies that administer EHV's are bound by the terms and conditions of [PIH Notice 2021-15](#). These vouchers are not eligible for MTW fungibility but must only be used for EHV eligible activities and to assist EHV eligible families. This applies to EHV HAP funding and to all forms of EHV administrative fees.

## 1.C Inapplicability of Project-Based Assistance

Project-based voucher assistance is not available with EHV vouchers. AHFC must administer these vouchers exclusively as tenant-based assistance.

### HUD Guidance

AHFC shall administer these vouchers in accordance with Housing Choice Voucher (HCV) regulations set forth at 24 CFR 982, [Public and Indian Housing \(PIH\) Notice 2021-15](#) and successive PIH Notices, specific terms set forth in the Memorandum of Understanding (MOU) and the AHFC Housing Choice Voucher Program Administrative Plan.

## 1.D Program Locations

EHV assistance is available in all AHFC voucher communities.

## 1.E Reasonable Accommodation

### HUD Guidance

Civil rights requirements cannot be waived. The EHV program is administered in accordance with applicable civil rights and fair housing requirements. These include applicable authorities under 24 CFR 5.105(a) and 24 CFR 982.53 including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, the Age Discrimination Act, the Americans with Disabilities Act, and HUD's Equal Access Rule.

## **2. Family Eligibility**

AHFC will not run a waiting list for EHV applicants. ACEH and AKCH2 will refer EHV eligible families for the issuance of vouchers. Eligibility for EHV is limited to individuals and families who are:

1. Homeless;
2. At-Risk of homelessness;
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking; or
4. Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.

Definitions for eligible populations are listed in the Memorandum of Understanding.

Families may apply for other open AHFC rental assistance programs such as the Public Housing (PH) program while participating in the EHV program. All applicants for AHFC's programs are placed on waiting lists in accordance with AHFC's policy eligibility requirements at the time of application.

### **2.A Social Security Number**

EHV families may self-certify that their social security number(s) is correct during the intake process. AHFC must have verification of the social security number within 180 days of the New Admission date. Refer to the Social Security Number Requirement exhibit, page 3, for accepted forms of verification.

As an alternate method of verifying family social security numbers, AHFC will accept the EIV Identity Verification Status. If the report states that the members are "verified," write a note on the print-out that it is for verification of SSNs and place a copy of only that page in the file location where SSN card copies go. No further verification is required.

### **2.B Eligible Citizenship Status**

EHV families may self-certify that a family member(s) has eligible citizenship status. AHFC has access to the SAVE system and staff will follow the policy in the Meet Citizenship Requirements exhibit. Family members that require additional verification will not delay a family's eligibility determination. Families may be admitted and family members may have up to 180 days to provide verification of eligible status.

Family members may also choose not to disclose their status or may declare themselves as ineligible. In those cases, AHFC will prorate assistance for that family.

## **2.C Date of Birth**

EHV families may self-certify their birth date(s). AHFC must have verification within 90 days of the new admission date.

AHFC staff may use the EIV Identity Verification Status to determine if the date of birth is correct. If the report states that the members are "verified," write a note on the print-out that it is for verification of birth dates and place a copy of only that page in the file location where date of birth copies go. No further verification is required.

## **2.D Picture Identification**

AHFC staff may accept an expired picture ID with a letter from the CoC point of contact or the service provider verifying identity.

## **3. Applicant Screening**

EHV applicants are subject to the same criteria as other voucher families with the exception of the below listed mandatory exceptions.

1. AHFC may not deny admission if a member of the family has been evicted from federally assisted housing in the last five years (see section 2.J Prior Assisted Housing Eviction of the Meet Screening Criteria exhibit).
2. AHFC may not deny admission if a family's assistance has been terminated (see section 2.K Prior Termination of Assistance of the Meet Screening Criteria exhibit).
3. AHFC may not deny admission if a family owes money to AHFC or another PHA (see section 2.H Money Owed to PHA of the Meet Screening Criteria exhibit).
  - a. AHFC will not deny admission if the family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.
  - b. AHFC will not deny admission if the family breached an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA.
4. AHFC may not deny admission for alcohol abuse (see section 1.H Alcohol Abuse of the Meet Screening Criteria exhibit).
5. AHFC may not deny admission for drug-related criminal activity (sections 1.D Drug-Related Criminal Activity Eviction and 1.E Drug-Related Activities of the Meet Screening Criteria exhibit).

Applicant families that are ineligible will receive the Ineligibility Notice along with the Applicant Informal Review. AHFC will copy the CoC point of contact or service provider with the Ineligibility Notice so they may assist the family.

### 3.A Income Eligibility

#### **AHFC Policy**

Under Moving to Work Activity 2014-1 Reasonable Rent and Family Self-Sufficiency Initiative approved by AHFC's Board of Directors with Resolution 2013-11 on February 27, 2013, EHV vouchers are part of AHFC's Set Aside program and subject to a streamlined income calculation.

### **Supplemental Security (SSI) and Social Security (SSA or SSDI) Income Benefit Letters**

EHV families receiving SSI, SSA, and/or SSDI benefits can self-certify this income or AHFC will accept documentation older than 60 days. In those instances where AHFC has accepted a family's self-certification of income, staff will pull EIV after the New Admission 50058 is submitted to HUD. Staff will:

- Review the EIV report and compare to the family's reported information.
- Resolve any discrepancies between the EIV report and the family information within 60 days of the EIV report date. This is a HUD requirement.

### **All Other Sources of Income**

EHV families can self-certify all income or AHFC will accept documentation older than 60 days. If the income type is not reported to EIV, staff must obtain verification through state system, third party verification or tenant provided documentation. In those instances where AHFC has accepted a family's self-certification of income, pull EIV after the New Admission 50058 is submitted to HUD. Staff will:

- Review the EIV report and compare to the family's reported information.
- Resolve any discrepancies between the EIV report and the family information within 60 days of the EIV report date. This is a HUD requirement.

## **4. Program Operations**

All opportunities available to MTW voucher families are available to EHV families. The following sections detail exceptions to HCV Administrative Plan operations.

### 4.A 50058 Coding Requirements

#### **HUD Guidance**

A new code (EHV) has been established for use on line 2n of the Family Report (form HUD-50058), which provides for an indication if the family participates in "other special programs."

#### **4.B Enterprise Income Verification (EIV)**

These vouchers are reported to HUD. Therefore, rules regarding Enterprise Income Verification (EIV) **apply**.

#### **4.C Examinations**

All EHV families will be subject to annual income and composition examinations. Families are not required to maintain supportive services in order to remain eligible for assistance on the EHV program.

#### **4.D Inspection Requirements**

EHV vouchers will follow the inspection requirements as set forth in the Housing Quality Standards Inspections chapter.

### **5. Leasing**

#### **5.A Initial Search Term**

##### **AHFC Policy**

EHV families must have an initial search term of at least 120 days. Any extensions, suspensions, and progress reports will remain under the policies in the PHA's administrative plan, but will apply after the minimum 120-day initial search term.

See the Applicant, Participant, and Owner Briefing exhibit for briefing materials. See the Issuance and Shopping exhibit for the voucher term and extensions.

#### **5.B HQS Initial Inspections**

##### **HUD Guidance**

To expedite the leasing process for tenant-based EHV, PHAs may pre-inspect available units that families may be interested in leasing to maintain a pool of eligible units. If an EHV family selects a unit that passed a HQS inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval (form HUD-52517), the unit may be approved as long as it meets all other conditions under 24 CFR 982.305. As required by 24 CFR 982.353(e), a PHA is prohibited from directly or indirectly reducing the family's opportunity to select among all available units. All regulatory requirements pertaining to HQS found at 24 CFR 982.401 apply to EHV.

## 5.C Initial Lease Term

### HUD Guidance

Under the HCV program, voucher participants must enter into an initial lease with the owner for one year, unless a shorter term would improve housing opportunities for the tenant and the shorter term is a prevailing market practice. To provide a greater range of housing opportunities for EHV families, initial leases may be less than 12 months regardless of whether the shorter term is a prevailing market practice.; therefore, both section 8(o)(7)(A) of the USHA of 1937, 42 U.S.C. 1437f(o)(7)(A), and 24 CFR 982.309(a)(2)(ii) are waived.

**EHV families may lease less than 12 months regardless of whether the shorter term is a prevailing market practice.**

## 5.D Exception to Payment Standards

### HUD Guidance

The HCV regulations at 24 CFR § 982.505(c)(4) require that if the payment standard amount is increased during the term of the HAP contract, the increased payment standard amount shall be used to calculate the monthly housing assistance payment for the family beginning at the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard amount.

HUD is waiving this requirement and, as an alternative requirement, providing a PHA with the discretion to establish a policy in the PHA administrative plan on when to apply the increased payment standard (e.g., interim reexamination, owner rent increase) after the effective date of the increase in the payment standard amount, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family's first regular reexamination following the change.

## 6. Archiving

Staff will follow archiving procedures for HCV when archiving EHV files. This includes ineligible and withdrawn applicant and participant files.

## 7. Services to Be Provided to Eligible EHV Families

ACEH and AKCH2, or its partners, will administer the service fees available for EHV families.

1. Service providers approved by the CoC will be responsible for providing services to EHV participants. A one-time service fee of up to \$3,500 has been allocated per EHV to support successful placements into housing and address the needs of eligible individuals and families. Service fees do not need to be spent prior to a housing placement and can be used to support the on-going needs of clients to ensure successful outcomes.

Service fees fall into four main components comprised of specific activities:

- a. Housing Search Assistance
    - i. Assisting clients identify and visit potential housing opportunities.
    - ii. Assisting clients identify units that meet the household's disability-related needs.
    - iii. Providing transportation to/from housing.
    - iv. Assisting clients with the completion of rental applications and AHFC forms.
  - b. Security Deposits/Utility Deposit/Rental Application/Holding Fee Uses
    - i. Application fees
      - (1) Non-refundable administrative or processing fees
      - (2) Refundable application deposit assistance
    - ii. Holding fees
    - iii. Security deposit assistance
    - iv. Utility deposit assistance and arrears
  - c. Landlord related uses
    - i. Landlord recruitment and outreach
    - ii. Landlord incentive and/or retention payments
  - d. Other eligible uses
    - i. Moving expenses (including move-in fees and deposits)
    - ii. Tenant-readiness services
      - (1) Assisting clients with establishing customized plans to address or mitigate barriers they may have in renting a unit (e.g. negative or lack of credit, negative rental or utility history, or to connect to other community resources)
    - iii. Essential household items (e.g. tableware, bedding, furniture, etc.)
    - iv. Renter's insurance if required by the lease
2. Service fee funds may only be used for costs deemed eligible, as specified in Public and Indian Housing Notice 2021-15 and any future PIH Notices.

3. Any service fee assistance that is returned to AHFC by ACEH, AKCH2, or its partners, after its initial or subsequent use may only be applied to the eligible service fees defined by the MOU, PIH Notice 2021-15 (or subsequent notice), or other EHV administrative costs.
4. ACEH and AKCH2 agree to avoid duplication of services and maximize the use of this limited resource.
5. ACEH and AKCH2, or its partners, agree to provide financial reporting on all EHV expenditures.

## **8. Mobility and Portability**

### **8.A In-State Moves**

EHV families may move their voucher to any community in Alaska, even if it is outside the voucher jurisdictions. EHV families do not have to meet the residency requirement at the time of admission and may request to move at voucher issuance.

### **8.B Portability Billing and Absorption**

EHV families may port their voucher to any PHA administering a voucher program at the time of admission. A receiving PHA cannot refuse to assist an incoming EHV family, regardless of whether the PHA does or does not currently administer EHV's. AHFC shall brief all outgoing Portabilities as to how porting may affect the family's assistance and special EHV services per the below HUD guidance.

#### **HUD Guidance**

If the EHV family moves under portability to another PHA that administers its own EHV's:

1. The receiving PHA may only absorb the incoming EHV family with an EHV (assuming it has an EHV voucher available to do so). If the PHA does not have an EHV available to absorb the family, it must bill the initial PHA. The receiving PHA must allow the family to lease the unit with EHV assistance and may not absorb the family with a regular HCV when the family leases the unit.
2. Regardless of whether the receiving PHA absorbs or bills the initial PHA for the family's EHV assistance, the EHV administration of the voucher is in accordance with the receiving PHA's EHV policies, although neighboring PHAs and PHAs in the same metro area or region are strongly encouraged to work collaboratively with one another to align EHV policies and help facilitate EHV portability moves between their jurisdictions.

3. If the EHV family moves under portability to another PHA that does not administer its own EHV, the receiving PHA may absorb the family into its regular HCV program or may bill the initial PHA.

### 8.C Portability- HAP and Administrative Fees

#### HUD Guidance

- A. HAP and ongoing fees: The requirements at 982.355(e) apply to portability billing arrangements on behalf of an EHV family:
  1. The initial PHA must promptly reimburse the receiving PHA for the full amount of the housing assistance payments made by the receiving PHA for the family.
  2. The initial PHA must promptly reimburse the receiving PHA for the lesser of 80 percent of the initial PHA's EHV ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee (or the receiving PHA's EHV ongoing administrative fee if the receiving PHA administers the EHV program). If both PHAs agree, the PHAs may negotiate a different amount of reimbursement.
- B. Services Fee Funding: If the receiving PHA, in consultation and coordination with the initial PHA, will provide eligible services or assistance to the incoming EHV family, the receiving PHA may be compensated for those costs by the initial PHA. This is the case regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up.

If the receiving PHA administers EHV's under its CACC, the receiving PHA may use its own services fee and may be reimbursed by the initial PHA, or the initial PHA may provide the services funding upfront to the receiving PHA for those fees and assistance. If the receiving PHA does not administer EHV's under its CACC, the initial PHA must provide the services funding upfront to the receiving PHA. Any amounts provided to the receiving PHA that are not used for services or assistance on behalf of the EHV family must promptly be returned by the receiving PHA to the initial PHA.

The amount of the service fee provided by the initial PHA may not exceed the lesser of the actual cost of the services and assistance provided to the family by the receiving PHA or \$1750, unless the initial PHA and receiving PHA mutually agree to change the \$1750 cap.

#### C. Placement fee/issuance reporting fee:

If the portability lease-up qualifies for the placement fee/issuance reporting fee, the receiving PHA receives the full amount of the placement component of the placement/issuance reporting fee. The receiving PHA is eligible for the placement

fee regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up. The initial PHA qualifies for the issuance reporting component of the placement fee, as applicable.

Note that the entire preliminary fee is always paid to and retained by the initial PHA and is not impacted by an EHV portability move

## 9. Termination of EHV Vouchers after September 30, 2023

### ARP Guidance

In accordance with the American Rescue Plan Appropriations Act, upon turnover, when an EHV participant (a family that is receiving rental assistance under a HAP contract) leaves the program for any reason, the PHA may not reissue that EHV to another family unless it does so no later than **September 30, 2023**.

## Abbreviations

1. **ACEH** -Anchorage Coalition to End Homelessness
2. **AKCH2** - Alaska Coalition on Housing and Homelessness
3. **ARP**- American Rescue Plan
4. **CoC**- Continuum of Care
5. **EHV** - Emergency Housing Vouchers
6. **HUD** - U.S. Department of Housing and Urban Development
7. **MOU**- Memorandum of Understanding
8. **PIH**- Public and Indian Housing

## Numbered Memo

22-32 Exhibit 11-11 Emergency Housing Voucher