

Exhibit 11-3

Returning Home Program

AHFC has partnered with the State of Alaska Department of Corrections (DOC) to administer a tenant-based rental assistance program. This program is designed to help families under the supervision of the Department of Corrections transition into the private rental market. Specific exceptions to the Housing Choice Voucher Administrative Plan are detailed in this policy.

1. Overview

In order to differentiate this assistance from MTW or Traditional Housing Choice Vouchers, the Returning Home Program (RHP) uses “coupons”. Funding for this program comes from two different sources.

HOME – The HOME Investment Partnerships Program provides formula grants to States and localities that communities use, often in partnership with local nonprofit groups, to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership or provide direct rental assistance to low-income families. These regulations are at 24 CFR 92. Any rental assistance funded with HOME funds is not eligible for use in the Anchorage jurisdiction.

MTW – Rental assistance with these funds comes from AHFC’s Moving to Work Block Grant. Moving to Work Activity 2010-9 approved by the AHFC Board of Directors on April 23, 2009 with Resolution 2009-10 provides the authority for this activity. For simplicity of administration, this program will mirror the regulations used for HOME. Any exceptions will be specifically noted in this policy.

1.A RHP Is Time-Limited

Each family is initially eligible for 12 months of rental assistance. An additional 12-month period of rental assistance is available to the family. A family’s eligibility for rental assistance ends after 24 months or the family’s second anniversary date, whichever comes first. A family’s rental assistance clock begins with their initial leasing. The time limit will not stop should the assistance be interrupted while a family chooses to shop for a different rental unit.

At the end of the rental assistance period, families may choose to continue their rental relationship with a landlord with a standard lease agreement.

1.A.1. RHP Term

Changes in family composition (additions or deletions) have no effect on a family's term. When adult household members are added, the new adult household member's participation will end on the same schedule established at the family's initial participation even if all of the original adult household members leave the family.

1.A.2. Less Than 12 Months of Assistance

For families with less than 12 months of assistance that wish to move to a new unit, see section How Many Moves in the Leasing chapter.

1.B Administration

AHFC will administer coupons under the same rules as a Housing Choice Voucher except as described in the sections below.

1.B.1. Both RHP Programs

1. These coupons are reissued to DOC referrals only.
2. The DOC contact will notify AHFC if a DOC coupon holder is not complying with their probation/parole requirements. This may result in termination.
3. AHFC will notify the DOC contact if a coupon holder is not complying with their program requirements, including timely payment of an AHFC Payment Agreement. This may result in termination.
4. A RHP family must lease in the jurisdiction where the coupon was issued unless approved in advance by AHFC and DOC as a reasonable accommodation or special circumstance.
5. A RHP family may transfer to another AHFC RHP area if approved in advance by the DOC contact and AHFC.

1.B.2. HOME Exceptions

1. These coupons are not reported to HUD. Therefore, rules regarding Enterprise Income Verification (EIV) **do not** apply.
2. These coupons are not eligible for fungibility under AHFC's Moving to Work Agreement.
3. The budget for these coupons is monitored by the Planning Department.

1.B.3. MTW Exceptions

1. These coupons are reported to HUD. Therefore, rules regarding Enterprise Income Verification (EIV) **apply**.
2. These coupons are eligible for fungibility under AHFC's Moving to Work Agreement.

3. These coupons are limited, and any transfers to the Anchorage jurisdiction will count against the number of available coupons.
4. The budget for these coupons is monitored by the Budget Department.

1.C Annual Income Determination

When determining the family's annual income, assets, and allowances, AHFC will use 24 CFR 5.609 regulations. This includes regulations pertaining to deductions, asset calculations (\$5,000), Income Disallowance for persons with disabilities, and the Student Rule.

1.D The Student Rule

The Student Rule applies to RHP families. AHFC will use existing Student Rule forms and Exhibit 2-7 for assistance. If a student can establish that she or he is an "independent" student, then that student may be eligible for RHP assistance if the student meets all other eligibility criteria.

2. Applicants

AHFC will follow the screening requirements set forth in Chapter 2 of the HCV Administrative Plan. Exceptions to the policy are listed below. Applicant families that are ineligible will receive the Ineligibility Notice along with the Informal Review. AHFC will copy the local point of contact with the Ineligibility Notice so they may assist the family.

2.A Referrals

DOC will select applicants for referral on a regular basis. A DOC central point of contact will forward referrals to the AHFC point of contact. DOC will include a local point of contact for landlord or AHFC use. Once the local AHFC office receives the referral, all questions and concerns will be directed to the applicant's local point of contact for resolution.

RHP referrals are handled in an expedited manner, as the family is ready for housing.

2.B Waiting Lists

AHFC will not run a waiting list for the RHP Program. These families may apply for other open AHFC rental assistance programs such as the Housing Choice Voucher or Public Housing programs while participating in the Re-Entry program. All applicants for AHFC's HCV or PH programs are placed on waiting lists in accordance with AHFC's policy and eligibility requirements at the time of application.

2.C Screening

AHFC will conduct eligibility interviews and screening in compliance with the policies and procedures in Chapter 2 and this Exhibit.

2.C.1. Income Limits

All RHP families must meet income limit requirements to be eligible for admission.

- HOME RHP – AHFC will use the income limit requirements for the HOME Program. Families must have gross annual income at 60 percent or below of area median income
- MTW RHP – AHFC will use the income limit requirements for the HCV Program. Families must have gross annual income at 50 percent or below of area median income

2.C.2. Criminal History Screening

AHFC will not screen the criminal history of the family, except for the sex offender registry screening. DOC is responsible for case management and monitoring of their referrals. Any previous criminal history is addressed in each family's case management plan.

2.C.3. Money Owed by a Family

The referral family **will not** receive a coupon until a debt is resolved.

1. Money Owed to AHFC

AHFC agrees to sign a Payment Agreement for any referrals that owe AHFC money from previous participation. The family may receive RHP rental assistance as long as they comply with the terms of the Agreement. DOC and AHFC will cooperate to ensure repayment.

All standard Payment Agreement policy guidelines apply. The Agreement may be signed at the intake/briefing appointment. The family must pay the down payment and sign the Agreement before receiving their coupon.

2. Money Owed to Another PHA

The family must resolve the debt with the PHA directly. AHFC cannot issue RHP assistance until the debt is paid. AHFC will notify the DOC contact immediately if a family owes money to another PHA.

2.C.4. Prior Program Participation

AHFC will not screen for prior program participation for these referrals, except as noted in this section for money owed and sex offender registry.

2.C.5. Sex Offender Registry

AHFC will deny participation to any member of a RHP household that is subject to a lifetime registration requirement as a sex offender. It is up to each individual to prove his/her registry requirement is not a lifetime requirement.

If a family member is subject to a sex offender registration requirement, AHFC will alert the DOC contact immediately. The DOC contact will speak to the family about the ineligible household member on the sex offender registry.

1. The household member must provide the registry requirement information to AHFC.
2. AHFC must admit the household member if the registry requirement is **NOT** a lifetime registry requirement.
3. This information is filed in the “permanent” section of the file.

3. Briefing and Coupon Issuance

Once a family is determined eligible, AHFC will proceed to coupon issuance using the RHP briefing materials. Coupons are issued with an initial shopping period of 30 days.

Families must lease in the jurisdiction where their coupon is initially issued. Families may not move at time of initial coupon issuance unless it is granted by AHFC and DOC in advance as a reasonable accommodation or special circumstance.

3.A Coupon Extensions

AHFC may offer two (2) 30-day extensions beyond the initial issuance to enable a RHP family to shop or lease. RHP families are expected to submit the Progress Report or leasing paperwork to demonstrate their efforts to utilize the coupon. AHFC will use prudent, professional judgment when deciding whether to extend a coupon.

It is expected that some families may bring in paperwork to lease after the expiration of their 90-day shopping period. AHFC may allow these families to continue with the leasing process if paperwork is brought in within a reasonable time, but in no case can that time exceed an additional 30 days.

3.B Coupon Expiration

If a family does not extend a coupon or submit leasing paperwork prior to the coupon's expiration, AHFC will withdraw the coupon. AHFC will send the Expired Coupon Notice to notify the family.

4. Leasing

HUD Regulation (24 CFR 92.253(a))

There must be a written lease between the tenant and the owner of rental housing assisted with HOME funds that is for a period of not less than 1 year, unless by mutual agreement between the tenant and the owner a shorter period is specified. The lease must incorporate the VAWA lease term/ addendum required under §92.359(e), except as otherwise provided by §92.359(b).

AHFC Policy

RHP families are expected to sign leases with an initial term of one year (12 months). If requested by the landlord and tenant and with a recommendation by the DOC contact, the lease may have an initial term of less than 12 months. Each local office may approve the lesser term based on the prevailing market conditions in their geographic area.

4.A Security Deposit Assistance

Under the RHP Program, families may receive security deposit assistance to enable them to lease (24 CFR 92.209(j)). Families may receive up to a maximum of two months of contract rent.

- This option is not available to families that choose to lease in-place.
- This option is not available as a reimbursement for security deposits previously paid by the family or others.

DOC will make the recommendation for security deposit assistance, and once the family selects a unit, they will complete the Security Deposit Assistance Request for AHFC to process.

5. Program Operations

Exceptions to the HCV Administrative Plan are stated below.

5.A Adding an Adult Household Member

If a family wishes to change its composition and add an adult to the household, the family must complete and submit the Re-Entry Additional Household Members. The landlord and the local DOC contact must both approve the addition before AHFC will process the adult for addition to the household. AHFC will follow the screening guidelines in this exhibit for the new adult member.

5.B Moves/Ports

A family that wishes to move must first make a written request for approval to AHFC before moving (Request to Move). Families are eligible to move (to a new unit or another jurisdiction) as long as they have a minimum of 12 months of housing

assistance remaining. Families may move between eligible RHP communities with the advance approval of AHFC and DOC.

Families wishing to move from another RHP jurisdiction to Anchorage will take an available coupon slot. Anchorage coupons may not be over leased without prior approval by the Public Housing Division Director or designee.

RHP families are not eligible to port their coupon outside Alaska.

5.C Annual Examination

AHFC will conduct the examination to verify household composition and income in accordance with Chapter 3 and Chapter 4. A participant may not receive more than 24 months of assistance. Under special circumstances, AHFC may choose to approve additional rental assistance periods if funding is available.

5.C.1. Ongoing DOC Supervision

Families are required to be under a DOC supervision requirement at the time of their initial examination. Families do not have to remain under a supervision requirement for the entire length of their rental assistances. Families must be in good standing and comply with annual examination requirements.

5.C.2. Examination Letters

AHFC will verify that RHP assistance may enter a second 12-month period by sending an email to the DOC local point of contact. If there is no response within ten (10) calendar days to an email request, AHFC may assume the family is eligible and proceed with the anniversary process.

5.C.3. Annual Income Limit

Under the HOME RHP Program, the family must meet the HOME Program low-income limit for its family size. AHFC will use the income limits in effect at the time of the annual examination appointment to verify that family income does not exceed 80 percent of area median income.

Under the MTW RHP Program, AHFC will implement guidelines in Chapter 8 for Zero HAP for these families.

5.C.4. Enterprise Income Verification (EIV)

See the Administration section above regarding requirements for the EIV.

5.C.5. Annual Inspection

AHFC will conduct an HQS inspection annually (24 CFR 92.209(i)).

6. Terminations

HUD Regulation (24 CFR 92.359)

(a) General. (1) The Violence Against Women Act (VAWA) requirements set forth in 24 CFR part 5, subpart L, apply to all HOME tenant-based rental assistance and rental housing assisted with HOME funds, as supplemented by this section.

(2) For the HOME program, the “covered housing provider,” as this term is used in HUD’s regulations in 24 CFR part 5, subpart L, refers to:

(i) The housing owner for the purposes of 24 CFR 5.2005(d)(1), (d)(3), and (d)(4) and § 5.2009(a); and

(ii) The participating jurisdiction and the owner for purposes of 24 CFR 5.2005(d)(2), 5.2005(e), and 5.2007, except as otherwise provided in paragraph (g) of this section.

(b) Effective date. The core statutory protections of VAWA that prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking became applicable upon enactment of VAWA 2013 on March 7, 2013. Compliance with the VAWA regulatory requirements under this section and 24 CFR part 5, subpart L, are required for any tenant-based rental assistance or rental housing project for which the date of the HOME funding commitment is on or after December 16, 2016.

AHFC Policy

AHFC will not terminate a RHP family without first discussing the circumstances with a supervisor and the local DOC contact. The local DOC contact will contact the family to try and resolve the violation. See Exhibit the Violence Against Women Act (VAWA) exhibit for VAWA protections.

6.A Violation of Parole/Probation

If a family violates a condition of parole/probation, AHFC will seek a recommendation from the DOC contact as to whether the assistance should be terminated or not. AHFC may also receive information from the DOC contact that requires investigation. After investigation, AHFC should discuss the result with the DOC contact to decide whether to proceed to termination.

6.B Incarceration

RHP individuals may be remanded to jail due to violations of their parole or probation. Whether AHFC terminates assistance immediately or waits for the annual examination depends upon the household composition.

6.B.1. Single Member Households

In no circumstance will RHP assistance continue when the individual has been absent from the unit 30 days or more in a 12-month period due to incarceration.

6.B.2. Two or More Household Members

If there are other adults in the unit that will continue to occupy the unit, assistance may continue through the end of the current HAP contract period. The household will not be eligible for a renewal at the annual anniversary.

6.B.3. Remaining Minors

If there are only minors left in the household, an adult family member may assume custody of the minors (with proper authorization) and assistance may continue through the end of the current contract period. The new adult is subject to AHFC screening criteria. The household will not be eligible for renewal at the annual anniversary.

6.C Notifications

All notifications for RHP program termination are issued to the family or landlord in writing.

6.C.1. Family Notice

If AHFC must terminate a family's participation due to violation of family obligations, expiration of rental assistance benefits, or because a family is at zero HAP, AHFC will send the Termination of Assistance.

- If at the annual anniversary, the end of the contract is the termination date.
- Otherwise, the termination date will be based on the family's particular circumstances.

6.C.2. Landlord Notice

AHFC will notify an owner/landlord of a contract termination by sending the Rental Assistance Contract Termination. The ending date will correspond to the end of the family's assistance.

7. Contact Procedures

All adverse notices to the family will be copied to the local DOC contact. The DOC contact will ensure that the family remains in compliance with their RHP requirements. The RHP coordinator or the local DOC contact may be furnished with copies of AHFC notices or forms upon their request.

8. Data Monitoring

The Central Office will produce a report monthly for AHFC's and its partner's use. This report will be shared with DOC to assess current budget usage, status of shopping coupons, number of coupons leased, and number of available coupons.

9. File Archiving

AHFC will follow the Quality Assurance and File Maintenance policy.

Numbered Memo

19-03 Rent Reform Policy Updates