

# **Exhibit 11-6**

## **Tenant-Based Rental Assistance (TBRA)**

### **Youth Aging Out of Foster Care**

AHFC has partnered with the State of Alaska Department of Health and Social Services Office of Children's Services (OCS) to administer a Tenant-Based Rental Assistance (TBRA) Program. This program is designed to help youth transitioning from foster care 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, TBRA rental assistance uses "coupons". Funding for this program comes from two different sources.

1. **HOME TBRA** - 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.
  
2. **MTW TBRA** - Rental assistance with these funds comes from AHFC's Moving to Work Block Grant and a Reimbursable Services Agreement with the Department of Health and Social Services. Moving to Work Activity 2013-1 approved by the AHFC Board of Directors on April 4, 2012 with Resolution 2012-10 provides the authority for this activity. For simplicity of administration, this program will mirror the regulations used for HOME TBRA. Any exceptions will be specifically noted in this policy.

#### **1.A TBRA Is Time-Limited**

Each family is initially eligible for 12 months of rental assistance. Two (2) additional 12-month periods of rental assistance are available to the family. A family's eligibility for rental assistance ends after 36 months or the family's third 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.B Administration**

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

### **1.B.1. Both TBRA Programs**

1. These coupons are reissued to OCS referrals only.
2. The OCS contact will notify AHFC if a coupon holder is not complying with their requirements. This may result in termination.
3. AHFC will notify the OCS 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 TBRA family must lease in the jurisdiction where the coupon was issued unless approved in advance by AHFC and OCS as a reasonable accommodation or special circumstance.
5. A TBRA family may transfer to another AHFC TBRA area if approved in advance by the OCS contact and AHFC.

### **1.B.2. HOME TBRA 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 TBRA 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 TBRA 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 TBRA 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**

OCS will select applicants for referral on a regular basis. An OCS central point of contact will forward referrals to the AHFC point of contact. OCS 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.

TBRA 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 TBRA-Youth 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 Youth 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 TBRA families must meet income limit requirements to be eligible for admission.

- HOME TBRA - 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 TBRA - 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. Money Owed by a Family**

The referral family **will not** receive a TBRA 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 TBRA rental assistance as long as they comply with the terms of the Agreement. OCS 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 TBRA coupon.

#### 2. Money Owed to Another PHA

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

### **2.C.3. Sex Offender Registry**

AHFC will deny participation to any member of a TBRA 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 OCS contact immediately. The OCS 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 TBRA briefing materials. TBRA 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 OCS 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 TBRA family to shop or lease. TBRA families are expected to submit the Progress Report or leasing paperwork to demonstrate their efforts to utilize the TBRA coupon. AHFC will use prudent, professional judgment when deciding whether to extend a coupon.

It is expected that some TBRA 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 TBRA coupon. AHFC will send the Expired Coupon Notice to notify the family.

### **4. Leasing**

TBRA 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 OCS 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 TBRA 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.

OCS 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 Youth Additional Household Members. The landlord must 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 TBRA communities with the advance approval of AHFC and OCS.

Families wishing to move from another TBRA 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.

TBRA 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 36 months of assistance. Under special circumstances, AHFC may choose to approve additional rental assistance periods if funding is available.

#### **5.C.1. Ongoing OCS Program Participation**

Families are required to be participants in the OCS Independent Living Program at the time of their initial examination. Families must be in good standing and comply with annual examination requirements.

#### **5.C.2. Examination Letters**

AHFC will verify that TBRA assistance may enter a second 12-month period by sending an email to the OCS 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 TBRA 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 TBRA 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**

AHFC will not terminate a TBRA family without first discussing the circumstances with a supervisor and the local OCS contact. The local OCS contact will contact the family to try and resolve the violation. See Exhibit 1-7 for VAWA protections.

### **6.A Notifications**

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

#### **6.A.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.A.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 OCS contact. The OCS contact will ensure that the family remains in compliance with their TBRA requirements.

The TBRA coordinator or the local OCS 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 OCS 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 (Chapter 12) policy.

### **Administrative Desk Manual**

Tenant-Based Rental Assistance – Youth