

## **Global Program Policies and Procedures**

### **ALASKA HOUSING STABILIZATION AND RECOVERY PROGRAM**

#### **In conjunction with the Alaska Housing Rent Relief Program**

Alaska Housing Finance Corporation has developed Policies and Procedures for several components of the Alaska Housing Rent Relief (AHRR) Program. This document is written to provide global Policy and Procedure guidance for the Alaska Housing Stabilization and Recovery Program (AHSR) program administration where clients are also being served in conjunction through AHRR

#### **Prioritization of Applicants**

Applicants who have been unemployed 90 or more days at the time of application, as well as applicants whose income is at or below 50% of the area median income will receive priority in the processing queue. Collectively, applicants that satisfy either of the preceding criteria will be referred to as the “Priority Population.”

The first stage in the AHSR program involves stabilization from an eligible housing status. Afterwards, the clients are assisted in finding a long term rental unit.

If the availability of rental housing units is exceeded by the number of priority households in search of a rental unit, the lease-up of the households within the priority population will take priority over non-priority population households.

Priority limit: In the event a household without priority status has been passed over for more than three calendar weeks in favor of priority households, the household will rejoin the queue based on their intake date.

#### **Policy on the Use of Attestations**

The client entry record for AHSR states that applicants have “...attested that the information provided is accurate and true to the best of [their] ability” by clicking on the application submission button.

Alaska Housing Finance Corporation considers this electronic attestation a digital signature once the submission button has been clicked in the online application.

In conjunction with the AHSR Navigator’s assessment, the Alaska Housing Finance Corporation will accept the use of this attestation for

- 1) Eligible Housing Status Verification
  - a. Persons sleeping outside;
  - b. Persons who are sleeping in shelters;
  - c. Persons who are victims of domestic violence;
  - d. Persons who are victims of human trafficking.
- 2) Income Verification

- a. A housing status that satisfies the eligibility requirements for this program will be used, in conjunction with households verbal attestation, as a fact-based-proxy for determining income eligibility
  - b. The Navigator will record the appropriate AMI designation based on the response from the prospective household.
- 3) Covid Hardship
  - 4) Housing instability and risk of homelessness
  - 5) The absence of duplicative assistance for rent and / or utilities

## **Policy on Eligible Expenses**

### Housing Stabilization and Recovery

The following expenses are eligible for Housing Stabilization and Recovery Services

- Case management related to housing stability
- Housing related services to survivors of domestic violence and / or human trafficking
- Specialized services for individuals with disabilities or seniors that support their ability to access or maintain housing
- Housing navigators that help households find housing
- Other necessary services that help households obtain or maintain housing

The following expenses are **not** eligible to be paid from the AHSR program:

- Services to a household who is currently housed or currently being stabilized/assisted by another program
  - The following program structure modification is in effect as of April 28, 2022:
    - Residents who were residing in non-congregate shelters funded through the Municipality of Anchorage resources on April 28, 2022 will have access to \$3,000 in moving expenses and up to 12 months of rental assistance. Clients entering the program under this category must have prior approval by AHFC.

### Rent Relief

The following expenses are eligible for the rental assistance portion of the AHRR program:

- Rent to Landlord(s): past due payments, current payments, future payments, late fees
- Utilities Payments: past due payments, current payments, future payments, late fees
- Mobile Home Space/Lot rent: past due payments, current payments, future payments, late fees
- Boat mooring fees, also known as boat slip fees, for water-based dwellings: past due payments, current payments, future payments, late fees
- Sales tax levied against rent where the cost is passed onto the tenant for payment.
- If the processing partner determines the late fees being assessed on an application are unreasonable, the late fees will not be eligible for payment.
- Late fees cannot exceed the amount of the monthly rent.

The following expenses will **not** be paid from the AHRR program:

- Moving expenses
- Reimbursements to the applicant for utility, rent payments and / or internet expenses
- Late fees added to a lease after the initial lease terms were previously agreed upon. Late fees that were originally set out on the lease are allowable.
- Rent increases made after the initial lease terms were previously agreed upon.

**Policy on the Number of Months of Assistance:**

For Housing Stabilization and Recovery program clients entering the AHRR program for the first time, they will receive up to 12 months of rental assistance.

For Housing Stabilization and Recovery program clients who have previously received assistance through AHRR, they can receive up to the number of months indicated below – not to exceed 18 months total:

- Clients who received between 0-6 months of assistance from AHRR are eligible for up to 12 months of rental assistance
- Clients who received between 7-12 months of assistance from AHRR are eligible for up to 6 months of rental assistance
- Clients who received 13-15 months of assistance from AHRR are eligible for up to 3 months of rental assistance

**Policy on AHRR Payments Processed**

Applicants use rental and utility assistance current and future amounts owed. Prior to issuing payment(s), all components of the request for AHRR must be complete.

**Example:**

An AHSR applicant will utilize AHRR for utility expenses and rent. The applicant is verified and satisfies all documentation requirements for the rental assistance requested, but the documentation for the lease and / or utility expenses is incomplete. In this case, the application will not be forwarded to the Finance Team for payment until complete paperwork has been provided for all portions of the AHRR requested.

All payments will be made to the landlord and utility providers. No payments will be made directly to the applicant households for applicants entering from AHSR.

If approved households separate and wish to move forward with future assistance at two separate locations, each client will be eligible for only the remaining number of months of assistance as indicated on the initial application.

**Policy on Fraud Prevention, Waste and Abuse**

- 1) Prior to AHRR payment, the tax identification number for all payees is verified through [Taxpayer Identification Number \(TIN\) Matching | Internal Revenue Service \(irs.gov\)](#)
- 2) Payments are restricted to utility providers and / or landlords

- 3) Landlords and utility providers submit their payee information through a separate interface from the applicant
  - a. Navigators for AHSR will enter Payee information into the portal that will be used for AHRR. Should any corrections come in from the Relief Support Specialists, the Navigator will work with the Payee to correct them.
- 4) The Relief Support Specialists verify the payee information with the applicant prior to issuing payment
- 5) Finance Team staff validates the payee information against submitted source document(s)
- 6) Online system safeguards have been added to limit the dollar amounts entered in on an application to where an application cannot have an excess of \$100,000 requested in total rent.
- 7) Only Application System's Review
  - a. Automatic checks are run to ensure unique email and physical addresses for submitted applications
  - b. Applicants are invited to withdraw duplicate applications where one person applies with a different email address for a housing unit that's already been identified through another application
  - c. Manual duplication checks are performed to compare multiple criteria (i.e. name and cell phone numbers are identical for more than one application)

#### **Policy on Required Documentation for AHRR**

Navigators will need to ensure that clients have the following documentation for AHRR processing:

- 1) Photo Identification;
- 2) Lease, or equivalent rental agreement;
- 3) Invoices, or other acceptable evidence, for amounts owed.

All other documentation requirements are subject to the facts and circumstances of the specific applicants AHRR request and may be satisfied through varying combinations of back-up documentation and attestations.

#### **Policy on Housing Instability and Risk of Homelessness**

Applicants for the AHRR will have demonstrated their housing instability and risk of homelessness by satisfying the program's eligibility criteria in the online application system. AHFC will rely on the attestations and documents provided in the application to evidence housing instability and risk of homelessness.

No further proof of housing instability and risk of homelessness will be required of the applicant. Further documentation would involve redundant certifications and / or impracticable source documentation that could create disparate program access and the provision of timely relief.

#### **Policy on Data Privacy and Security**

All application data is covered by AHFC's Information Security Policy (attached). Further protections for Data Privacy and Security are outlined below:

- 1) Access to the AHSR Navigation portal and AHRR requires director level approval for each person
- 2) Access to the online application for AHRR processing teams is requested by a designated Team Lead, who identifies all staff by name and email address after noting that they have read and acknowledged the required disclosures and policies

- 3) Processing team member access is reviewed and approved by AHFC's Planning Department Director, or their designee, and then routed to the system administrator
- 4) The system administrator sends a secure email with login instructions for the team member(s)
- 5) System access for everyone outside of the system administrator is
  - a. Restricted to systems from within AHFC's headquarters (for AHFC staff)
  - b. Restricted to business hours of operation approved by AHFC
  - c. Restricted by the access level noted in the system access form
- 6) Housing Relief Specialist and Navigation staff are prohibited from downloading and / or printing application materials for individual clients
- 7) Property owners and landlords are unable to access applicant records and information
- 8) The online application system provides a one-way entry for information. No information can be extracted or viewed after the submission phase by anyone outside of the processing team.
- 9) All interactions with the application system are conducted via secure protocol (256-bit TLS) and encrypted where stored (AES-256). Systems are ISO/IEC27001 certified and GDPR and HIPAA compliant.

#### **AHRR - Incorporated Policies and Procedures**

*AHRR Housing Relief Support Specialist - Policies and Procedures*

*AHRR Finance - Policies and Procedures*

*AHRR and AHSR Appeals Process - Policies and Procedures*

*AHFC's Information Security Policy, February 2020*