

# Municipality of Anchorage



## Housing and Community Development 2022 Action Plan

DRAFT

July 11, 2022



**Municipality of Anchorage**

**Housing and Community Development  
2022 Action Plan**

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## AP-05 Executive Summary

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### 1. Introduction

This document is the fifth of five annual action plans under the Municipality of Anchorage (Municipality) Housing and Community Development Consolidated Plan for 2018-2022 (Con Plan). The Municipality is a participating jurisdiction and is eligible to receive U.S. Department of Housing and Urban Development (HUD) funding for three federal entitlement programs that focus on the housing and community development needs of low- and moderate-income persons. These programs are:

1. Community Development Block Grants (CDBG),
2. HOME Investment Partnerships Program (HOME), and
3. Emergency Solutions Grant (ESG).

The Municipality is required to submit a Con Plan that covers a five-year period that outlines the intended distribution of these HUD dollars. To meet this requirement, the Municipality submitted the 2018-2022 Con Plan for the local HUD office to review and approve. In addition to the submission of a five-year plan, the Municipality is required to submit an Annual Action Plan (AP) that reflects funding for specific activities and projects that meet Con Plan goals for each year thereafter.

The 2022 AP projected allocations for the Municipality include the following federal programs: CDBG \$1,894,631; HOME \$778,755; and ESG \$163,790 for a total of \$2,837,176. The 2022 AP also includes a budget of \$86,991 in CDBG Program Income. The 2022 AP details the distribution of HUD funding as guided by the Municipal Mayor and Assembly and three public comment hearings. It is anticipated that the Municipality will receive the 2022 HUD funding late in 2022 and will begin the proposed projects in late 2022 and 2023.

### 2. Summary of the objectives and outcomes identified in the Plan.

**This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis, or the strategic plan.**

Each activity in the 2022 AP corresponds to one of the following two HUD-designated objectives:

1. Suitable Living Environment
2. Decent Affordable Housing

In addition, each activity in the 2022 AP corresponds to one of the following three HUD-designated outcome categories:

1. Availability/Accessibility
2. Affordability
3. Sustainability: Promoting Livable or Viable Communities

The AP-35 Projects section of the 2022 AP details respective objectives and outcomes for each of the activities proposed.

### 3. Evaluation of past performance

**This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.**

The relatively flat HUD funding allocations to the Municipality in the face of increasing needs and rising costs makes the process of setting goals a challenge. Because of relatively flat budgets for CDBG and HOME programs, the goals laid out in the 2018-2022 Con Plan have been set to reflect the level of available funding, recognizing that there will still be unmet need.

In 2018, the Municipality, the Anchorage Coalition to End Homelessness, the United Way, the Rasmuson Foundation, other stake holders, and their partners released Anchored Home: 2018-2021, an update of the 2015 Anchorage Community Plan to End Homelessness. The four pillars of the plan are:

- Prevention and Diversion led by the United Way of Anchorage,
- Housing and Support Systems led the Anchorage Coalition to End Homelessness,
- Public Health and Safety led by the Housing and Homelessness Coordinator from, the Municipality of Anchorage; and
- Advocacy and Funding led by the Rasmuson Foundation.

Link to Anchored Home 2020 plan: <https://aceh.org/anchored-home/>

Link to Anchorage Coalition to End Homelessness: <https://aceh.org/>

The Housing, Homeless and Neighborhood Development (HHAND) Commission passed a resolution (Appendix G) in support and endorsement of the goals of the 2018-2021 Anchored Home Plan on April 3, 2019. The HHAND Commission also held listening sessions with representatives from various groups working on the Anchored Home pillars including the Housing and Homelessness Coordinator for the Municipality, the Community Action Policing Team, and the Mobile Intervention Team.

This 2022 AP represents the fifth year of implementation of the objectives set forth in the 2018-2022 Con Plan. The Anchorage Health Department (AHD) staff met multiple times and conducted additional research to determine the appropriate mix of projects for the 2022 AP. In addition, we continue to support funding of a Community Housing Development Organization (CHDO) homebuyer development project. In recent years, we have had difficulty in identifying viable CHDO projects. By combining 2022 HOME funds with projected proceeds from past CHDO projects, we anticipate there will be funding sufficient for acquisition and rehabilitation of additional low/moderate income housing units in the future.

In recent years, the Municipality has provided recurring annual funding to a small number of agencies with CDBG public service funds. For the sake of continuity, we will continue to fund those agencies through FY2022 while also informing them of our intent to broaden the use of public service funding in the future.

### 4. Summary of Citizen Participation and Consultation Process

## **Summary from citizen participation section of plan.**

Pursuant to federal regulations (24 CFR 91.115), the Municipality developed and adopted a Citizen Participation Plan included as Appendix A. The key annual activities designed to encourage citizen participation are to hold at least three public hearings during the program year and offer public comment periods for the draft version of the 2022 AP for various groups such as non-profit organizations and the general public.

An advertisement was placed in the Anchorage Daily News (ADN), a newspaper based in Anchorage with statewide distribution, on February 8, 2022 to announce the beginning of the 2022 AP process, public hearing, and the comment period. The public hearing was held from 3:30 PM to 4:30 PM with a virtual meeting on Microsoft Teams on February 15, 2022.

The comment period for the above public notice was from February 8, 2022 to 4:00 PM, March 10, 2022.

A second advertisement was placed in the ADN on June 17, 2022 to announce the availability of the 2022 AP for review, 30-day public comment period and the July 6, 2022 public hearing. The public hearing was held from 4:00 PM to 5:30 PM with a virtual meeting on Microsoft Teams at the HHAND Commission meeting.

The comment period for the above public notice was from June 17, 2022 to 10:00 AM, July 18, 2022. Copies of the draft 2022 AP were available at the Municipality AHD, at 825 L Street, Room 506, and through the AHD web site at: <https://tinyurl.com/AHD-CSD>.

A summary of public comments received is included below and were considered in finalizing the 2022 AP. The final public hearing will be held before the Anchorage Municipal Assembly on August 9, 2022.

To help the Municipality broaden public participation in the development of the draft 2022 AP, the AP was posted on the Municipality's website, emailed to over 350 addresses on the citizens participation list maintained by the AHD, emailed to the 40 community councils, emailed to the news media, emailed to the ACEH membership list, and emailed to partner agencies that participated in drafting the plan.

### **5. Summary of public comments**

**This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.**

#### **February 15, 2022 Public Hearing and Public Comment Period.**

No public comments were received.

#### **July 6, 2022 Public Hearing and Public Comment Period.**

TBD

### **6. Summary of comments or views not accepted and the reasons for not accepting them.**

TBD

### **7. Summary**

As evidenced by the Con Plan, there are many housing, homelessness, and community development needs in the Municipality. The Municipality has identified projects to fund in the 2022 AP to help maintain and develop affordable housing and for homeless prevention. The 2022 AP reflects the CDBG, HOME, and ESG funding for projects that are intended to serve low-income and the homeless residents living in the Municipality.

## PR-05 Lead & Responsible Agencies

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### 1. Agency/entity responsible for preparing/administering the Consolidated Plan.

**Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

**Table PR-05.1. - Responsible Agencies**

Agency Role	Name	Department/Agency
Lead Agency	Municipality of Anchorage	Anchorage Health Department/Community Safety and Development

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## AP-10 Consultation

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### 1. Introduction

This section provides a summary of the activities the Municipality of Anchorage (Municipality) conducted during development and review of the 2022 Action Plan (AP) to collect input from other public and private agencies that provide housing, health services, and social services.

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A summary of public comments received is included below and were considered in finalizing the 2022 AP. The final public hearing will be held before the Anchorage Municipal Assembly on August 9, 2022.

To help the Municipality broaden public participation in the development of the draft 2022 AP, the AP was posted on the Municipality's website, emailed to over 350 addresses on the citizens participation list maintained by the AHD, emailed to the 40 community councils, emailed to the news media, emailed to the ACEH membership list, and emailed to partner agencies that participated in drafting the plan.

### **Summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies.**

The Municipality made efforts to consult with adjacent units of the Municipal government and regional government (state and federal) agencies, particularly agencies with planning and transportation. Emails were sent and phone calls made to these agencies. In addition, the Municipality communicated with the Community Development Department (Municipality Planning Department), the AHD, Chugach Electric Association (CEA), Enstar, State Historic Preservation Office, Solid Waste Services, Anchorage Water and Wastewater Utility, Anchorage Police Department, Anchorage Fire Department, Parks and Recreation

Department, Municipality Traffic Division of Public Works Department and other agencies when preparing Environmental Assessments for projects funded in past Action Plans.

The Municipality collaborates with its constituents in several ways. Staff from the Municipality AHD supports and participates in various local committees and commissions including the ACEH, Housing, Homeless and Neighborhood Development (HHAND) Commission, Senior Citizens Advisory Commission, Americans with Disabilities Act Advisory Commission, The Committee on Housing and Homelessness, and the Health and Human Services Commission.

The AHD coordinates with past AP subrecipients that include Rural Alaska Community Action Program (RurAL CAP), NeighborWorks Alaska (NWA), Covenant House Alaska (CHA), Habitat for Humanity Anchorage, Cook Inlet Housing Authority, Anchorage Community Mental Health Services, Alaska Legal Services Corporation (ALSC), Catholic Social Services (CSS), Challenge Alaska, Alaska Literacy Program, Anchorage Senior Activity Center, United Nonprofits, Cook Inlet Housing Authority and Volunteers of American Alaska. Also, the Municipality partners with Abused Women's Aid in Crisis, Standing Together Against Rape and Victims for Justice through the Alaska Domestic Violence and Sexual Assault Intervention Program.

The AHD continues to collaborate with the Alaska Housing Finance Corporation, the Alaska Mental Health Trust Authority, the State of Alaska's Department of Health and Social Services, United Way and other entities to enhance financing opportunities for additional housing, rental assistance and supportive services within the Municipality. Community, Safety, and Development (CSD) has an extensive email lists that include the general public, agencies, the HHAND Commission, the Municipal Assembly, Community Councils, and the news media. Emails are sent out to provide public notice for public hearings and public comment periods. Emails are sent out to provide notice of funding availability. CSD also works with the housing providers to fund new projects. CSD staff also attend the HHAND Commission meetings to provide support and information on the funding, projects, programs, and reports.

CSD staff consults with the State of Alaska, Department of Health and Social Services, Division of Public Health, Section of Epidemiology. The State's refers the Municipality to Bulletin No. 7: Blood Lead Epidemiology and Surveillance, Non-Occupational Exposures in Adults and Children – Alaska, 1995–2006. The results in the bulletin indicate no instances of elevated blood-lead level in the target population, children under six and pregnant women, due to lead-based paint in housing. Furthermore, the Municipality's own research of its housing programs, indicates zero occurrences. CSD staff monitors the State's announcements about lead-based paint in housing. There have been no significant announcements.

However, the Municipality continues to comply with the requirements of Part 35. It implements this compliance through the Municipality Lead-Based Paint Policy and Lead-Based Paint Procedures, which continues to be part of the required activities of the Municipality's Subrecipients and Community Housing Development Organization (CHDO)s administering programs including housing built before 1978.

**Coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Municipality, and in particular the AHD, actively participates with the ACEH, which serves as the Continuum of Care for Anchorage.

Homelessness is a high priority issue for the Anchorage Mayor, Assembly, and AHD. The AHD collaborates with multiple social services agencies – including Rural CAP, Catholic Social Services, and Alaska Legal Services – to support homeless individuals and families as well as those at risk of homelessness. The AHD also houses the Aging and Disability Resource Center (ADRC) which operates an Emergency Solutions grant (ESG) funded homeless prevention program.

ACEH implements Coordinated Entry with housing and supportive service providers. Coordinated Entry is designed to coordinate and prioritize access to housing and homeless programs for households experiencing homelessness and to ensure that clients - regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status - have an opportunity to be referred to a housing provider. ACEH is currently in the process of re-envisioning their Coordinated Entry system to provide enhanced support for homeless prevention and diversion. AHD staff have met with ACEH to understand their plans and provide input related to program needs.

The Municipality is one of the lead agencies in the development and implementation of the Anchored Home Plan to Solve Homelessness in Anchorage: 2018-2021. The other lead agencies are the Anchorage Coalition to End Homelessness, the United Way, the Alaska Mental Health Trust Authority, and the Rasmuson Foundation.

The Municipality funds the following programs to support individuals and families who are homeless or at risk of becoming homeless:

- At Risk of Homelessness Individuals and Families Program – ALSC provides direct legal assistance to households at risk of becoming homeless. This legal assistance is aimed at immediately increasing an at-risk individual's or family's safety and stability by keeping or securing housing, obtaining orders of protection and assisting with income maintenance issues such as securing child support and public benefits.
- Tenant Based Rental Assistance – Through this program, NWA administers rental assistance to very low-income households who experience homelessness and include at least one individual with a physical or mental disability, substance abuse or chronic health condition. The families assisted by this program live in scattered sites across Anchorage
- Permanent Supportive Housing Case Management –RurAL CAP provides 55 units of single-occupancy affordable Permanent Supportive Housing (PSH) at Safe Harbor Sitka Place. Sitka Place tenants are chronically homeless individuals, and many with co-occurring disorders (mental health and substance use disorder as diagnosed in

the Diagnostic and Statistical Manual of Mental Disorders (DSM-V). MOA funds case management services for this project in order to increase the ability of these extremely low-income, hard to serve individuals to remain housed.

- Homelessness Prevention - The ADRC, housed in the AHD, provides housing relocation and stabilization services through the Homeless Prevention Program funded by ESG. To be eligible for this program, individuals or families must be at risk of homelessness with income at or below 30% of the area median income (AMI) and lack immediately available resources or support networks to prevent them from needing to move into an emergency shelter. Match derived for the ESG Homelessness Prevention grant provides utility assistance to very low-income households.
- Rapid Rehousing – CSS administers the ESG Rapid Rehousing Program for the Municipality. Rapid Rehousing is designed to move people experiencing homelessness to permanent housing through housing relocation and stabilization services and short and/or medium-term rental assistance. CSS uses the Coordinated Entry System to identify families who match the program criteria.

**Consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS.**

In addition to the ACEH Board of Directors, the ACEH governing representation includes a second layer of governance, the Anchorage Homeless Prevention and Response System Advisory Council. The Advisory Council oversees the health of the Anchorage Homeless Response System including the Continuum of Care (CoC) design and support, the annual Anchorage community needs prioritization (Gap Analysis), Coordinated Entry redesign, HMIS governance, and the Built for Zero and Anchored Home initiatives. This added governance layer allows more input and oversight for operation, administration, and development of policies and procedures. The AHD Human Services Division Manager serves on the ACEH Homeless Prevention and Response System Advisory Council. Municipal representatives also participate in the CoC project application process.

The AHD Community Safety and Development Program (CSD) Manager, who oversees the HUD CDBG, HOME, HTF, and ESG grants, the AHD's Housing and Homelessness Program Manager, and the AHD ADRC Program Manager, who oversees the ESG funded Homeless Prevention project, consult with the ACEH staff periodically regarding the current and future Coordinated Entry systems. ACEH, in consultation with AHD, is in the process of updating current Coordinated Entry policies and procedures to provide more robust support for homeless prevention, reporting, and coordination.

AHD staff also meet with ACEH to discuss how to best address the needs of people experiencing homelessness across the Municipality and to devise solutions to challenges as they arise. AHD and ACEH have coordinated with and participated in the Municipality's response to the risk associated with COVID-19 in the homeless community.

ESG subrecipients collect and enter data into the CoC Alaska Homeless Management Information System (AKHMIS) database on all individuals served with ESG funds. The Municipality participates in the CoC Coordinated Entry by entering data in AKHMIS on individuals who are living in homeless camps and have been interviewed by the Anchorage Police Department Mobile Intervention Team.

**2. Agencies, groups, organizations and others who participated in the process and consultations:**

Table AP-10.1 lists the commissions, committees and agencies who participated in developing the 2022 AP.

**Table AP-10.1. - Agencies, groups, organizations and others who participated in the process and consultations**

Agency Group Organization	Agency Group Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
1. Municipality Of Anchorage (Municipality)	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Health Agency Other government - Local	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs – Veterans Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs Economic Development Market Analysis Lead-based Paint Strategy Anti-poverty Strategy	Departments/Divisions/Sections are consulted through meetings, emails and phone calls. Anchorage Health Department staff committees and commissions that provide oversight to the Municipality’s programs. The Planning Department was consulted on Barriers to Affordable Housing. Anticipated outcomes are better coordinated and referral services at the Anchorage Health Department.
2. Abused Women's Aid in Crisis (AWAIC)	Housing Services-Victims of Domestic Violence Services-Homeless	Housing Need Assessment Homelessness Strategy Homeless Needs—Chronically homeless	The Municipality reviews performance reports submitted by AWAIC. Anticipated outcome is that AWAIC receives Alaska Domestic Violence Sexual Assault Intervention Program (ADVSAIP) funding for providing emergency financial assistance to women and their children who are victims of domestic violence and may be experiencing homelessness. AWAIC participates in bi-monthly ADVSAIP meetings with CSD, which include discussions of housing and service needs.

Agency Group Organization	Agency Group Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
3. Alaska Legal Services Corporation (ALSC)	Housing Services-Children Services-Homeless	Homeless Needs - Families with Children Housing Need Assessment Other: Barriers to Affordable Housing	The Municipality reviews performance reports submitted by ALSC. Anticipated outcome is that ALSC receives CDBG Public Service funding for providing direct assistance individuals and families to prevent homelessness.
4. Alaska Literacy Program (ALP)	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Homeless Services-Education	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs – Veterans Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strat	The Municipality reviews performance reports submitted by ALP that provides English language instruction to adults with low literacy skills and limited English proficiency. ALP received 2016 CDBG funding for the rehabilitation of their office which will be completed in 2022.
5. Anchorage Coalition to End Homelessness (ACEH)	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Homeless Services-Education	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs – Veterans Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs	The Municipality interacts on a regular basis with Anchorage Coalition to End Homelessness. AHD participates on the ACEH Homeless Prevention and Response System Advisory Council. AHD coordinates with ACEH on its allocation of ESG funding.

Agency Group Organization	Agency Group Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
6. Anchorage Senior Activity Center (ASAC)	Services-Elderly Persons Services-Persons with Disabilities Services-Homeless Services-Health Services-Education	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homelessness Needs – Veterans Non-Homeless Special Needs Economic Development Market Analysis	The Municipality reviews performance reports submitted by ASAC funded by the Municipality’s Aging and Disability Resource Center’s operating funds.
7. Catholic Social Services (CSS)	Housing Services-Elderly Persons Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Homeless Services-Education	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homelessness Needs - Veterans Homeless Needs - Families with Children Homelessness Needs - Unaccompanied Youth	The Municipality reviews Alaska Homeless Management Information System reports entered by CSS. Anticipated outcome is that CSS receives ESG-CV funding for providing Rapid Re-housing services to individuals and families. CSS also receives CDBG Public Service funding for providing beds at a shelter for homeless individuals. CSD staff communicate periodically with CSS regarding staffing challenges, service needs, and other possible projects.
8. Chugiak Senior Citizens	Services-Elderly Persons Services-Persons with Disabilities Services-Homeless Services-Health Services-Education	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homelessness Needs – Veterans Non-Homeless Special Needs Economic Development Market Analysis	The Municipality reviews performance reports submitted by Anchorage Senior Activity Center funded by the Municipality’s Aging and Disability Resource Center’s operating funds.



Agency Group Organization	Agency Group Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
9. Cook Inlet Housing Authority (CIHA)	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Homeless Services-Education	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Veterans	The Municipality reviews the performance of CIHA. Anticipated outcome is that CIHA receives CDBG, HOME, and HTF funding for construction and rehabilitation of rental housing for low-income individuals and families. CSD communicates throughout the year with CIHA to understand capacity and interest in future projects that will benefit low/moderate income residents.
10. Habitat for Humanity Anchorage (Habitat)	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with Children Homelessness Needs - Veterans	The Municipality reviews the performance of Habitat and their interest in future projects that will benefit low/moderate income residents. Anticipated outcome is that Habitat receives CDBG/HOME funding for the development of new housing and down payment assistance to individuals and families purchasing their first home.
11. NeighborWorks Alaska (NWA)	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Homeless Services-Education	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Veterans	The Municipality reviews the performance of NWA and their interest in future projects that will benefit low/moderate income residents. Anticipated outcome is that NWA receives HOME funding for the Tenant-Based Rental Assistance program for the chronically homeless and possibly other affordable housing projects.

Agency Group Organization	Agency Group Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
12. Rural Alaska Community Action Program (RurAL CAP)	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Homeless Services-Education	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Veterans	The Municipality reviews the performance of RurAL CAP. Anticipated outcome is that RurAL CAP receives CDBG/HOME/HTF funding for rehabilitation of rental housing and mobile homes for low-income individuals and families. CDBG Public Service funding for providing direct assistance to homeless individuals and case management for homeless individuals to keep them housed. CSD staff communicate periodically with RurAL CAP regarding staffing challenges and service needs. CSD has funded RurAL CAP HTF funds for the rehabilitation of Karluk Manor that started in 2020.
13. Standing Together Against Rape (STAR)	Housing Services-Children Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with Children Homelessness Needs - Unaccompanied Youth	The Municipality reviews performance reports submitted by STAR. Anticipated outcome is that STAR receives Alaska Domestic Violence Sexual Assault Intervention Program (ADVSAIP) funding for providing emergency financial assistance to women and men who are victims of sexual assault and are experiencing homelessness. STAR participates in bi-monthly ADVSAIP meetings which include discussions of housing and service needs.

Agency Group Organization	Agency Group Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
14. United Nonprofits, LLC	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education Health Agency	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs – Veterans Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs Economic Development Market Analysis Lead-based Paint Strategy Anti-poverty Strategy	The Municipality reviews performance reports submitted by United Nonprofits. United Nonprofits received 2016 CDBG funding for the rehabilitation of common areas in a building which was completed in April 2019. The building was occupied by the following organizations: Standing Together Against Rape, Alaska AIDS Assistance Association, Habitat for Humanity Anchorage, Big Brothers/Big Sisters, Victims for Justice, Anchorage Community Councils, the American Civil Liberties Union of Alaska, and the Statewide Independent Living Council.
15. Veterans Administration (VA)	Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Homeless Services-Education Other government - Federal	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with Children Homelessness Needs - Veterans Non-Homeless Special Needs	The Municipality meets monthly with agencies serving veterans with the VA. The anticipated outcomes of the consultation are to improve coordination of housing and services to veterans and to include their input in the Consolidated Plan and Action Plan.

Agency Group Organization	Agency Group Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
16. Victims for Justice (VFJ)	Housing Services-Children Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with Children Homelessness Needs - Unaccompanied Youth	The Municipality reviews performance reports submitted by VFJ. Anticipated outcome is that VFJ receives Alaska Domestic Violence Sexual Assault Intervention Program (ADVSAIP) funding for providing emergency financial assistance to women and men who are victims of interpersonal violence and may be experiencing homelessness. VFJ participates in bi-monthly ADVSAIP meetings which include discussions of housing and service needs.
17. Volunteers of American Alaska	Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with Children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth Market Analysis	The Municipality works with Volunteers of America Alaska who is a Community Housing and Development Organization in the Municipality.

Agency Group Organization	Agency Group Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
18. HUD	Housing Other Government - Federal	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs – Veterans Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs Economic Development Market Analysis General Assistance	The Municipality interacts on a regular basis with HUD. Anticipated outcomes are that HUD provides the Municipality with technical assistance and training opportunities.

**Agency Types not consulted and provide rationale for not consulting**

The Municipality made effort to include many interested community members and agencies in the 2022 AP process by holding three public hearings and posting the draft 2022 AP on the Municipal website. There was no decision to exclude any community member or agency.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

**Table AP-10.2. - Other local/regional/state/federal planning efforts considered when preparing the Plan:**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Anchorage Continuum of Care (CoC)	Anchorage Coalition to End Homelessness	Common goals: There is an overlap for data driven goals, need to reduce number of homeless households, increase the number of permanent supported housing units, emphasis to provide number of beds needed for chronically homeless, increase in case management and supportive services, and to evaluate discharge of persons from mental health, prison, hospital systems and foster care to avoid homelessness.

Anchored Home Plan	Housing, Homeless and Neighborhood Development (HHAND) and Anchorage Coalition to End Homelessness	Common goals: Establish a centralized or coordinated entry system, participate in the Alaska Homeless Management Information System to track and identify gaps in homeless services, support Point in Time homeless count, measure outcomes goals for the Continuum of Care application, increase in the number of permanent supported housing units, and increase in case management and supportive services. The Coalition provides input to the Municipal Actin Plans and CAPERs. In October 2018, the Anchorage Coalition to End Homelessness published Anchored Home, a Strategic Action Plan to Solve Homelessness in Anchorage: 2018-2021. The Coalition attends HHAND Commission meetings and presents updates on their progress.
Alaska Veterans Administration (VA) Healthcare System	VA	Common goal: Commitment to ending veteran homelessness. Increase in the number of VASH Vouchers and permanent supported housing units in Anchorage.





## **AP-12 Citizen Participation**

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### **1. Summary of citizen participation process/Efforts made to broaden citizen participation**

#### **Summary of citizen participation process and how it impacted goal-setting**

The Municipality of Anchorage (Municipality) uses a variety of media to notify community members and agencies of various activities associated with the allocation of HOME Investment Partnerships Program (HOME), Community Development Block Grants (CDBG), Emergency Solutions Grant (ESG), and Housing Trust Fund (HTF) funds. Public meetings regarding the 2022 Action Plan (AP) were advertised in the Anchorage Daily News (ADN), a newspaper of general circulation, and posted on the Municipal website. Comments and the specific concerns mentioned are addressed by the proposed AP projects.

**Table AP-12.1. - Citizen Participation Outreach**

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1. Newspaper Ad	<ul style="list-style-type: none"> <li>• Minorities</li> <li>• Non-English Speaking - Specify Other Language: Spanish</li> <li>• Persons with Disabilities</li> <li>• Non-Targeted/</li> <li>• Broad Community</li> <li>• Residents of Public and Assisted Housing</li> </ul>	A public notice was posted in the ADN on February 8, 2022 for the 2022 AP Public Hearing on February 15, 2022 and a 30 day public comment period.	None	N/A	<a href="https://tinyurl.com/AHD-CSD">https://tinyurl.com/AHD-CSD</a>

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2. First Public Meeting	<ul style="list-style-type: none"> <li>• Minorities</li> <li>• Non-English Speaking - Specify Other Language: Spanish</li> <li>• Persons with Disabilities</li> <li>• Non-Targeted/ Broad Community</li> <li>• Residents of Public and Assisted Housing</li> </ul>	<p>February 15, 2022 Held in person at AHD office and virtually on Microsoft Teams. The hearing discussed the amount of assistance the Municipality expected to receive in 2022, the range of activities to be considered to benefit low- and moderate-income persons and the priority needs of the Consolidated Plan.</p>	None	N/A	<a href="https://tinyurl.com/AHD-CSD">https://tinyurl.com/AHD-CSD</a>

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3. Newspaper Ad	<ul style="list-style-type: none"> <li>• Minorities</li> <li>• Non-English Speaking - Specify Other Language: Spanish</li> <li>• Persons with Disabilities</li> <li>• Non-Targeted/ Broad Community</li> <li>• Residents of Public and Assisted Housing</li> </ul>	A public notice was posted in the ADN on June 17, 2022 for the Public Hearing on July 6, 2022 on the draft 2022 AP. Public Comment period was June 17, 2022 to July 18, 2022.	TBD	TBD	<a href="https://tinyurl.com/AHD-CSD">https://tinyurl.com/AHD-CSD</a>

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4. Second Public Meeting	<ul style="list-style-type: none"> <li>• Minorities</li> <li>• Non-English Speaking - Specify Other Language: Spanish</li> <li>• Persons with Disabilities</li> <li>• Non-Targeted/ Broad Community</li> <li>• Residents of Public and Assisted Housing</li> </ul>	July 6, 2022. Held in person at HHAND Commission meeting and virtually on Microsoft Teams.	TBD	TBD	<a href="https://tinyurl.com/AHD-CSD">https://tinyurl.com/AHD-CSD</a>

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5. Third Public Meeting	<ul style="list-style-type: none"> <li>• Minorities</li> <li>• Non-English Speaking - Specify Other Language: Spanish</li> <li>• Persons with Disabilities</li> <li>• Non-Targeted/ Broad Community Residents of Public and Assisted Housing</li> </ul>	August 9, 2022 at the Anchorage Municipal Assembly Meeting	TBD	TBD	<a href="https://tinyurl.com/AHD-CSD">https://tinyurl.com/AHD-CSD</a>

## AP-15 Expected Resources

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### Introduction

Public agencies rely on HUD funding to deliver housing and supportive services programs that address the broad spectrum of housing needs in the community. While community need continues to outstrip funding, available HUD funding enhances the ability of public and private agencies to assist individuals and families, and to leverage resources for State or other funding.

The allocated funding resources that the Municipality of Anchorage (Municipality) for 2022 are \$1,894,631 for Community Development Block Grants (CDBG), \$778,755 for HOME Investment Partnerships Program (HOME), and \$163,790 for Emergency Solutions Grant (ESG).

Table AP-15.1 lists current and past HUD allocations. The Expected Amount Available Year 5 columns in Table AP-15.2 shows the projected annual funding resources for 2022, but it does not include funding from prior resources mentioned in prior Action Plans.

**Table AP-15.1. - HUD Funding Allocation**

Program Year	CDBG	HOME	ESG	HTF
2022	\$1,894,631	\$778,755	\$163,790	0
2021	\$1,948,478	\$748,644	\$155,133	0
2020	\$1,818,770	\$723,361	\$151,146	0
2019	\$1,720,154	\$663,207	\$146,461	0
2018	\$1,726,068	\$733,068	\$145,198	\$733,068
2017	\$1,612,907	\$543,890	\$144,598	\$543,890
2016	\$1,606,172	\$545,535	\$145,258	\$545,085
2015	\$1,613,622	\$530,461	\$150,740	
2014	\$1,691,113	\$598,918	\$143,987	
2013	\$1,772,393	\$591,911	\$124,916	
2012	\$1,712,284	\$628,693	\$147,888	
2011	\$1,707,768	\$946,309	\$82,511	

### CDBG Narrative Description

The 2022 CDBG funds will be used to expand the supply of decent and affordable housing and create suitable living environments for very low- and low- to moderate-income individuals and families through rehabilitation of low- and moderate-income rental and homeowner housing and improvement of public facilities. These funds are also used to support public services by non-profit agencies to provide supportive services to the homeless and low- to moderate-income individuals and families. See section AP-35 for a list of projects that will be funded with 2022 HUD funding and Program Income. HUD regulations allow up to 15% of the CDBG annual fund allocation to be used for eligible public services activities. The Municipality plans to reserve 20% of the CDBG allocation funding for administrative, planning, and compliance purposes.

The benefit to low- and moderate income (LMI) persons is often referred to as the primary national objective because the statute requires that recipients expend 70% of their CDBG funds to meet the LMI national objective. The CDBG programs must further ensure that the projects will primarily benefit low-income persons.

This funding potentially leverages additional funding from the private sector through non-profit agencies contributions, Alaska Housing Finance Corporation (AHFC) grants, Low-Income Housing Tax Credits and foundations.

When program Income is generated by the Municipality and subrecipients, funding will be used to support CDBG program as per HUDs requirements.

### **HOME Narrative Description**

The 2022 HOME funds will be used to fund a CHDO Housing Program with Habitat for Humanity Anchorage, and fund Tenant-Based Rental Assistance (TBRA) with NeighborWorks Alaska. By combining 2022 HOME funds with projected proceeds from past CHDO projects, we anticipate there will be funding sufficient for acquisition and rehabilitation of additional low/moderate income housing units in the future. TBRA helps very-low and low-income families pay their rent and related housing expenses such as security and utility deposits and rental subsidies for up to 24 months while the household engages in a self-sufficiency program. Additional funds may be set-aside to aid beyond 24 months for households meeting certain program requirements.

See section AP-35 for a list of projects that will be funded with 2022 funding and Program Income. The Municipality plans to reserve 10% of the HOME allocation funding for administrative, planning, and compliance purposes. There is a 25% match requirement for each dollar of HOME funds spent on affordable housing. At least 15% of HOME funds will be set aside for specific activities to be undertaken by a CHDO to develop affordable housing for the community it serves. There is also a 5% of HOME funds programmed to Community Housing and Development Organization Operating Assistance.

This funding potentially leverages additional funding from the private sector through non-profit agencies contributions, AHFC grants, Low-Income Housing Tax Credits, and foundations.

The Municipality has an established resale provision that safeguards the properties continued affordability or recaptures all or part of the HOME subsidy. Program Income generated by the Municipality and subrecipients will be used to support the HOME program as per HUD's requirements.

### **ESG Narrative Description**

The 2022 ESG funds will be used to support Homelessness Prevention activities. See section AP-35 for a list of projects that will be funded with 2022 funding. The Municipality plans to reserve 7.5% of the ESG allocation funding for administrative, planning, and compliance purposes.

ESG requires a dollar for dollar match to the federal share. The Municipality local general government funds salary and benefits for an ESG intake specialists labor costs through the



Municipality's Anchorage Health Department (AHD) Aging and Disability Resource Center (ADRC); AHFCs Basic Homeless Assistance Program further assists homeless and near-homeless Alaskans and is a match to the Rapid Rehousing Program. A cash match for utilities is generated by the Chugach Electric Heating Assistance Program in Anchorage for customers needing assistance due to severe financial crisis and the Anchorage Water and Wastewater Utility, Coins Can Count Program. These are both voluntary programs that provide the opportunity to help members of our community who are at risk of having their electricity or water disconnected.

**Table AP-15.2. - Anticipated Resources 2022 – Priority Table**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5			
			2022 Annual Allocation	Program Income	Total	Expected Amount Available Remainder of Con Plan
CDBG	Public-Federal	Administration and Planning	\$378,926	\$17,398	\$396,324	\$0
		Activity Delivery Costs	\$66,513	\$0	\$66,513	
		Housing Programs	\$1,151,949	\$69,593	\$1,221,542	
		Public Facility	\$0	\$0	\$0	
		Public Services	\$297,243	\$0	\$297,243	
		<b>Total:</b>	<b>\$1,894,631</b>	<b>\$86,991</b>	<b>\$1,981,622</b>	
HOME	Public-Federal	Administration and Planning	\$77,876	\$0	\$77,876	\$0
		CHDO Operating Assistance	\$38,938	\$0	\$38,938	
		Housing Programs	\$411,942	\$0	\$411,942	
		Tenant-Based Rental Assistance	\$250,000	\$0	\$250,000	
			<b>Total:</b>	<b>\$778,755</b>	<b>\$0</b>	
ESG	Public-Federal	Administration and Planning	\$12,284	\$0	\$12,284	\$0
		Homelessness Prevention	\$151,506	\$0	\$151,506	
		<b>Total:</b>	<b>\$163,790</b>	<b>\$0</b>	<b>\$163,790</b>	
HTF	Pass Thru Federal	Administration and Planning	\$0	\$0	\$0	\$0
		Housing Programs	\$0	\$0	\$0	
			<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	

**Note: The amounts may contain rounding values for reporting purposes.**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

**Other Sources**

The following is an overview of federal, State, and local public and private sector resources expected to be available to address identified needs in 2021. We anticipate a similar pattern of leveraging will be used for 2022.

The Municipality will continue its efforts to coordinate housing resources with other community funders such as AHFC, CIHA, and Alaska Mental Health Trust Authority regarding housing opportunities. The Municipality and subrecipients will continue to leverage all opportunities and funding to assist low- to moderate-income individuals and families with affordable housing.

ESG requires a dollar for dollar match to the federal award. The Municipality's local funds provide for an ESG intake specialist's labor and benefits costs through the Municipality's AHD ADRC. AHFC's Basic Homeless Assistance Program further assists people experiencing homelessness and at risk of homelessness and is a match to the Rapid Rehousing Program. A cash match for utilities is generated by the Chugach Electric Heating Assistance Program and the Anchorage Water and Wastewater Utility Coins Can Count Program. Both utilities assist customers in Anchorage who are low-income or at risk of having their electricity or water disconnected.

Of relevance in the 2022 Action Plan (AP) are the leveraged resources associated with the HOME Program. HOME regulations require a 25% match to HOME funds drawn down from the treasury on eligible projects (not including administrative or operating expense assistance funds). Last year, the Municipality carried-forward over \$10.04 million of unrestricted match. Furthermore, the Municipality has carried on its books over \$7.4 million in restricted match-credit from affordable housing bonds proceeds. However, housing bond proceeds may only be used for up to 25% of the annual match obligation. Additional match for 2022 is unknown at this time.

All sources of match will be reported in the Consolidated Annual Performance and Evaluation Reports.

**2022 Action Plan**

The anticipated program income for CDBG for 2022 is \$86,991. No program income is expected for HOME or ESG.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

There are no publicly owned land or property located within the Municipality of Anchorage that will be used to address the needs identified in the 2018-2022 Consolidated Plan or the 2022 AP.

**4. Discussion**

The Municipality will continue to work with housing and supportive service agencies to develop strategies where funding can be coordinated to support mutually identified goals and outcomes that assist low- and moderate-income individuals and families. The Municipality will also facilitate cross-department conversations to better understand how funding can be used to support existing and emerging community development and transportation plans.

## **AP-20 Annual Goals and Objectives**

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### **AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3) & (e)**

The following goals tables show the goals established in the 2018-2022 Consolidated Plan. These are the goals for the 2022 Action Plan (AP).

**Table AP-20.1. - Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Priority Needs Addressed	Funding	Goal Outcome Indicator
1.	Rental Housing Development	2022	2024	Affordable Housing	Anchorage	Low-Income & Housed Populations	HOME: \$411,942  CDBG: \$821,542	TBD
2.	Public Services	2022	2023	Homeless	Anchorage	Public Services	CDBG: \$297,243	Public Service for Low/Moderate Income Housing Benefit: 450 Households Assisted & 225 Homeless Assisted
3.	Mobile Home Rehabilitation	2022	2023	Affordable Housing	Anchorage	Low-Income & Housed Populations	CDBG: \$400,000	Homeowner Housing Rehabilitated: 20 Household Housing Units
4.	Homelessness Prevention	2022	2023	Homeless	Anchorage	Homeless Populations	ESG: \$151,506	TBD
5.	Tenant-Based Rental Assistance	2022	2023	Affordable Housing	Anchorage	Low-Income & Housed Populations	HOME: \$250,000	Tenant-Based Rental Assistance: 36 Households Assisted
6.	CHDO Operating Expense Assistance	2022	2023	Affordable Housing	Anchorage	Low-Income & Housed Populations	HOME: \$38,938	Other: 1 Other

**Table AP-20.2. - Goal Descriptions**

1	<b>Goal Name</b>	Rental Housing Development
	<b>Goal Description</b>	Acquisition, New Construction, Rehabilitation and Operating Cost Assistance TBD - \$1,233,484 (\$821,542 CDBG funds, \$411,942 HOME funds)
	<b>Outcome</b>	Availability/accessibility
	<b>Objective</b>	Provide decent affordable housing
2	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Rural Alaska Community Action Program - Case Management Sitka Place \$71,560 CDBG funds Rural Alaska Community Action Program – Homeless Outreach - \$43,095 CDBG funds Choosing Our Roots – Case Management, Facility Repairs - \$70,000 CDBG funds New Life Development – Residential Re-Entry - \$75,000 CDBG funds Nine Star – Net 2 Ladder - \$24,540
	<b>Outcome</b>	Availability/Accessibility
	<b>Objective</b>	Create suitable living environments
3	<b>Goal Name</b>	Mobile Home Rehabilitation
	<b>Goal Description</b>	Rural Alaska Community Action Program - \$400,000 CDBG funds
	<b>Outcome</b>	Affordability
	<b>Objective</b>	Provide decent affordable housing
4	<b>Goal Name</b>	Homeless Prevention
	<b>Goal Description</b>	Aging and Disability Resource Center - \$151,506 Homelessness Prevention
	<b>Outcome</b>	Availability/Accessibility
	<b>Objective</b>	Create suitable living environments
5	<b>Goal Name</b>	Tenant-Based Rental Assistance
	<b>Goal Description</b>	NeighborWorks Alaska - \$250,000 HOME funds
	<b>Outcome</b>	Availability/Accessibility
	<b>Objective</b>	Provide decent affordable housing

6	<b>Goal Name</b>	Community Housing Development Organization Operating Expense Assistance
	<b>Goal Description</b>	Habitat of Humanity Anchorage - \$38,938 HOME funds
	<b>Outcome</b>	Affordability
	<b>Objective</b>	Provide decent affordable housing



**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)**

The HOME funding largely remains unallocated and the number of families that will be served is unknown at this time.

The Municipality will continue to support the Rural Alaska Community Action Program's Mobile Home Repair Program (MHRP), a home rehabilitation program for approximately 20 homeowners of mobile homes per year. The MHRP targets low- to moderate-income households (80% Area Median Income or less).

The Municipality will continue to support NeighborWorks Alaska's Tenant-Based Rental Assistance (TBRA), a rental assistance program that plans to continue assisting 36 households in 2022. The TBRA targets the homeless and low-income (50% AMI or less) households that include at least one member who experience a physical or mental disability, substance abuse, or disabling chronic health condition.



## **AP-35 Projects - 91.220(d)**

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### **Introduction**

The Municipality expects to receive Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) for program year 2022. The programs that are planned for program year 2022 are discussed in this section. The Municipality of Anchorage (Municipality) anticipates receiving approval from HUD for the 2022 Action Plan in 2022 and to start funding projects in 2022 and 2023. This section describes the projects the Municipality intends to support with these 2022 funds.

### **HUD Programs Addressed in the 2022 Action Plan**

#### **CDBG**

- Housing Programs – Acquisition TBD
- Mobile Home Repair Program – Rural Alaska Community Action Program
- Activity Delivery Costs
- Public Services – Choosing our Roots – Case Management and Facility Repairs
- Public Services - Rural Alaska Community Action Program - Case Management Sitka Place
- Public Services – New Life Development – Residential Re-Entry
- Public Services – Rural Alaska Community Action Program – Homeless Outreach

#### **HOME**

- Rental Housing Development – Acquisition – TBD
- Tenant-Based Rental Assistance - NeighborWorks Alaska
- CHDO Operating Expense Assistance – Habitat for Humanity Anchorage

#### **ESG**

- Homelessness Prevention – Aging and Disability Resource Center

### 3. Project Information

**Table AP-35.1. - 2022 Projects**

	<b>Projected Funding Sources</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>Total</b>
	2022 Allocations	\$ 1,894,631	\$ 778,755	\$ 163,790	\$ 2,837,176
	Program Income	\$ 86,991	\$ -	\$ -	\$ -
	Total Sources	\$ 1,981,622	\$ 778,755	\$ 163,790	\$ 2,924,167
<b>#</b>	<b>Project Name</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>Total</b>
1	CDBG Administrative	\$ 396,324			\$ 396,324
2	HOME Administrative		\$ 77,875		\$ 77,875
3	ESG Administrative			\$ 12,284	\$ 12,284
	<b>CDBG Projects</b>				
4	Mobile Home Repair – RurAL CAP	\$ 400,000			\$ 400,000
5	TBD - Acquisition	\$ 821,542			\$ 821,542
6	Activity Delivery Costs	\$ 66,513			\$ 66,513
7	Public Services - Choosing Our Roots	\$ 70,000			\$ 70,000
8	Public Services - Sitka Place Case Management - Rural CAP	\$ 71,560			\$ 71,560
9	Public Services - Residential Re-entry – New Life Development	\$ 75,000			\$ 75,000
10	Public Services - Homeless Outreach - Rural CAP	\$ 43,095			\$ 43,095
11	Public Services – Net 2 Ladder – Nine Star	\$ 37,588			\$ 24,540
	<b>HOME Projects</b>				
12	CHDO Operating Expense - Habitat for Humanity		\$ 38,938		\$ 38,938
13	TBD - Acquisition		\$ 411,942		\$ 411,942
14	Tenant Based Rental Assistance - NeighborWorks Alaska		\$ 250,000		\$ 250,000
	<b>ESG Projects</b>				
15	Homelessness Prevention – Aging and Disability Resource Center			\$ 151,506	\$ 151,506
	<b>Total</b>	<b>\$ 1,981,622</b>	<b>\$ 778,755</b>	<b>\$ 163,790</b>	<b>\$ 2,924,167</b>

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs.

The relatively flat HUD funding allocations to the Municipality in the face of increasing needs and rising costs makes the process of setting goals a challenge. Because of relatively flat budgets for CDBG and HOME programs, the goals laid out in the 2018-2022 Consolidated Plan (Con Plan) have been set to reflect the level of available funding recognizing that there will still be unmet need.

The allocation priorities for the 2022 Action Plan (AP) were derived from the needs recognized in the 2018-2022 Con Plan. The three main obstacles to addressing underserved needs include: lack of funding; lack of available land for construction of affordable housing; and, high cost of land and building materials.

Objectives specifically related to homelessness include: expand the supply of rental housing for special needs populations, with an emphasis on the homeless, as outlined in the affordable housing strategy section in the 2018-2022 Con Plan; educate the public about the issue of homelessness; engage in homeless prevention activities and homeless services; support case management services in order to assist people in obtaining or retaining permanent housing; assist in the development of a coordinated intake and discharge system in Anchorage; housing affordability through rental assistance; support existing shelter services; and the expansion of permanent housing services.

In 2018, the Municipality, the Anchorage Coalition to End Homelessness, the United Way, the Rasmuson Foundation and their partners released Anchored Home: 2018-2021, an update of the 2015 Anchorage Community Plan to End Homelessness (ACEH). The four pillars of the plan are Prevention and Diversion, Housing and Support Systems, Public Health and Safety, and Advocacy and Funding.

The Anchored Home 2020 priorities include (1) improving community health, safety and emergency systems through increased year round overflow shelter capacity, increased day shelter options, and better communication channels with the general public through Community Councils; (2) increasing quantity, quality, and efficacy of Housing and Support services through permanent supportive housing, rapid re-housing, and continued enhancement of the Coordinated Entry system.

Link to Anchored Home 2020 plan: <https://anchoragehomeless.org/anchored-home/>

Link to Mayor's page on homelessness: <https://bit.ly/housingandhomelessness>

Link to Anchorage Coalition to End Homelessness: <https://anchoragehomeless.org/>



## AP-38 Project Summary Information

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### 1. CDBG Administration, Planning, and Grant Management

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Affordable Housing CHDO Rental Housing Development Homeless Facilities Homeowner Rehabilitation Mobile Home Rehabilitation Public Facilities and Improvements Public Services
<b>Needs Addressed</b>	Homeless Populations Low-Income & Housing Populations Public Facilities Public Services
<b>Funding</b>	CDBG \$378,926, Source: Grant; \$17,398, Source: Program Income
<b>Description</b>	<p>Grant management, planning, and technical assistance to carry out CDBG, CDBG-CV, HOME, HTF and selected other activities. Several planning, technical assistance and grant management activities have been identified for 2022 and include the following:</p> <ul style="list-style-type: none"> <li>A. General management of the CDBG and HOME projects and programs, including the drafting of Action Plans and Consolidated Annual Performance and Evaluation Report, executing procurement processes including RFP procedures and drafting written agreements</li> <li>B. Monitoring subrecipient agreements, recordkeeping and budgets, and assuring all federal and local guidelines are met, including eligibility under HUD national objectives, Davis Bacon Labor Standards, environmental reviews, fair housing and affirmative marketing</li> <li>C. Environmental reviews for projects initiated and funded by HUD (other than CDBG, CDBG-CV, HOME, ESG, and HTF projects)</li> <li>D. Assist in the development of planning strategies and community development planning efforts with other housing and service agencies</li> </ul>

	<p>E. Program evaluations</p> <p>F. Direct Anchorage Health Department operational costs and indirect costs as determined by the Intra-Governmental Chargeback System</p> <p>FY 2022 CDBG Administration, Planning, and Grant Management costs are allocated at 20% of the CDBG Entitlement allocation plus 20% of any Program Income funds received.</p>
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
<b>Location Description</b>	Administration for CDBG, HOME, ESG, and HTF is at 825 L Street, Anchorage, Alaska.
<b>Planned Activities</b>	24 CFR 570.205 & 206 - Eligible planning and program administrative costs.

## 2. HOME Administration, Planning, and Grant Management

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Affordable Homeownership Rental Housing Development Tenant Based Rental Assistance
<b>Needs Addressed</b>	Low-Income & Housing Populations
<b>Funding</b>	HOME \$77,875, Source: Grant



<b>Description</b>	<p>Up to 10% of all new HOME funds, including Program Income may be used for administration, planning, and grant management. These funds will be used for general management of HOME projects and programs, including the drafting of the Action Plans and Consolidated Annual Performance and Evaluation Report, executing procurement processes including Application/Request for grant proposal (RFGP) procedures and drafting written agreements, and general office expenses. Funds will also support the monitoring subrecipient agreements, recordkeeping, and budgets, and assuring all federal and local guidelines are met, including eligibility under HUD national objectives, Davis Bacon Labor Standards, environmental reviews, fair housing and affirmative marketing.</p> <p>FY 2022 HOME Administration, Planning, and Grant Management costs are allocated at 10% of the HOME Entitlement formula allocation plus 10% of any Program Income funds received.</p>
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
<b>Location Description</b>	Administration for CDBG, HOME, ESG, and HTF is at 825 L Street, Anchorage, Alaska.
<b>Planned Activities</b>	24 CFR 92.207 - Eligible administrative and planning costs.

### 3. ESG Administration, Planning, and Grant Management

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Homeless Prevention and Rapid Re-housing
<b>Needs Addressed</b>	Homeless Populations
<b>Funding</b>	2022 ESG \$12,284, Source: Grant

<b>Description</b>	<p>Up to 7.5% of ESG grant funds may be used for administration, planning, and grant management. These costs include overall program management, coordination, monitoring, and evaluation; training on ESG requirements; costs of preparing and amending the ESG and homelessness-related sections of the Consolidate Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report; and environmental review costs.</p> <p>FY 2022 ESG Administration, Planning, and Grant Management costs are allocated at 7.5% of the ESG Entitlement formula allocation.</p>
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
<b>Location Description</b>	825 L St., Anchorage, Alaska.
<b>Planned Activities</b>	24 CFR 576.108 – Administrative Activities

#### 4. Mobile Home Repair Program - Rural Alaska Community Action Program

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Homeowner Housing Rehabilitated Mobile Home Rehabilitation Program (MHRP)
<b>Needs Addressed</b>	Low-Income & Housing Populations
<b>Funding</b>	CDBG \$400,000, Source: Grant
<b>Description</b>	The MHRP is administered by Rural Alaska Community Action Program and assists low-income families who own and occupy a mobile home in need of minor repairs. This assistance is in the form of a one-time grant of up to \$20,000. Funds are primarily used for EPDM roof covering, heating system replacement, hot water tank replacement, mobile home leveling, and skirting. Mobile homes comprise an important element of the affordable housing stock in the Municipality. The Municipality developed the MHRP to focus on repairs of aging mobile homes in order to preserve a portion of this affordable housing stock.
<b>Target Date</b>	12/31/2023 (multi-year funding this is the last option period)
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	RurAL CAP estimates it will complete 20 units. The target population is owner-occupied mobile-home owner with low/moderate incomes less than 80% Area Median Income.
<b>Location Description</b>	Municipality of Anchorage - City wide (Girdwood to Eklutna).
<b>Planned Activities</b>	24 CFR 570.202 (a)(1) - Privately owned buildings and improvements for residential purposes; improvements to a single-family residential property which is also used as a place of business, which are required in order to operate the business, need not be considered to be rehabilitation of a commercial or industrial building, if the improvements also provide general benefit to the residential occupants of the building.

## 5. TBD - Acquisition

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Affordable Housing
<b>Needs Addressed</b>	Low-Income & Housing Populations
<b>Funding</b>	CDBG \$755,949, Source: Grant; \$65,593, Source: Program Income
<b>Description</b>	Acquisition of property for housing development
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBD
<b>Location Description</b>	TBD
<b>Planned Activities</b>	24 CFR 570.201 (a) - Acquisition

## 6. Activity Delivery Costs

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Affordable Housing Homeowner Rehabilitation Mobile Home Repair Program Rental Housing Development Tenant-Based Rental Assistance Public Facilities
<b>Needs Addressed</b>	Low-Income & Housing Populations
<b>Funding</b>	CDBG \$66,512, Source: Grant
<b>Description</b>	Activity Delivery Costs for the Municipality
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The goal is to provide Activity Delivery Costs on active and/or previous on-going projects.
<b>Location Description</b>	Municipality of Anchorage
<b>Planned Activities</b>	24 CFR 570.201 (k) - Housing services. Housing services, as provided in section 105(a)(21) of the Act (42 U.S.C. 5305(a)(21)).  Rental Development. 24 CFR 92.205 (a)(1) - HOME funds may be used by a PJ to provide incentives to develop and support affordable rental housing through the acquisition, new construction, reconstruction, or rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site improvement. The housing must be permanent or transitional housing. The specific eligible costs are set forth in sections 92.206 through 92.209. 24 CFR 570.202 (b)(1) - Assistance to private individuals and entities, including profit making and nonprofit organizations, to acquire for the purpose of rehabilitation, and to rehabilitate properties, for use or re-sale for residential purposes.

**7. CDBG Public Services – Choosing Our Roots**

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Public Services
<b>Needs Addressed</b>	Public Services
<b>Funding</b>	CDBG \$70,000, Source: Grant
<b>Description</b>	Case Management and Facility Repairs
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	25 homeless young adults
<b>Location Description</b>	TBD, Anchorage, Alaska
<b>Planned Activities</b>	570.201(e) – Public Services.

**8. CDBG Public Services – Rural Alaska Community Action Program - Case Management Sitka Place**

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Public Services
<b>Needs Addressed</b>	Public Services
<b>Funding</b>	CDBG \$71,560, Source: Grant
<b>Description</b>	Rural Alaska Community Action Program provides case management and supportive services to homeless individuals with disabilities living in permanent supportive housing at Sitka Place.
<b>Target Date</b>	12/31/2023

<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Sitka Place will house at least 50 individuals who are chronic homeless and with disabilities and extremely low- to very low-income.
<b>Location Description</b>	Safe Harbor - Sitka Place
<b>Planned Activities</b>	570.201(e) – Public Services.

### 9. CDBG Public Services – New Life Development

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Public Services
<b>Needs Addressed</b>	Public Services
<b>Funding</b>	CDBG \$75,000, Source: Grant
<b>Description</b>	Residential Re-Entry
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBD
<b>Location Description</b>	TBD
<b>Planned Activities</b>	570.201(e) – Public Services.

**10. CDBG Public Services – Rural Alaska Community Action Program – Homeless Outreach**

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Public Services
<b>Needs Addressed</b>	Public Services
<b>Funding</b>	CDBG \$43,095, Source: Grant
<b>Description</b>	<p>RurAL CAP will provide a bridge to homeless services in the community to ensure that individuals experiencing homelessness have access to needed resources that relate to housing. The target population will be homeless individuals and individuals who are in crisis, who are experiencing severe needs. Priority will be given to individuals with incomes at 50% of the Area Median Income, who have a history of hospitalization and/or law enforcement contacts, are top users of the Anchorage Safety Center, and have a high vulnerability rating.</p> <p>This population frequently experiences co-occurring disorders (mental health and substance use disorders), as diagnosed in the Diagnostic and Statistical Manual of Mental Disorders (DSM-V).</p>
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	60 individuals who are chronic homeless and with disabilities
<b>Location Description</b>	Scattered sites in Anchorage
<b>Planned Activities</b>	570.201(e) – Public Services.

**11. CDBG Public Services – Nine Star Net 2 Ladder**

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Public Services



<b>Needs Addressed</b>	Public Services
<b>Funding</b>	CDBG \$37,588, Source: Grant
<b>Description</b>	Nine Star’s Net2Ladder (N2L) will deliver services that prevent homelessness and improve the quality of life for all Alaskans. N2L services will reduce the ranks of individuals and their families in danger of losing stable housing. The services assist clients in readiness to get a job, improvement to obtain a new or improved employment, participate in activities to keep employment, and follow-up coaching to advance in their employment.
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBD
<b>Location Description</b>	730 I Street, Anchorage, AK 99501
<b>Planned Activities</b>	570.201(e) – Public Services.

## 12. TBD - Acquisition

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Rental Housing Development
<b>Needs Addressed</b>	Low-Income & Housing Populations
<b>Funding</b>	HOME \$411,942
<b>Description</b>	Acquisition of property for housing development
<b>Target Date</b>	12/31/2025
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBD
<b>Location Description</b>	TBD
<b>Planned Activities</b>	Rental Development. 24 CFR 92.205 (a)(1) - HOME funds may be used by a PJ to provide incentives to develop and support affordable rental housing through the acquisition, new construction, reconstruction, or rehabilitation of non-luxury housing with suitable amenities, including real property acquisition and site improvements. The housing must be permanent or transitional housing. The specific eligible costs are set forth in sections 92.206 through 92.209.

**13. Tenant-Based Rental Assistance - NeighborWorks Alaska**

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Tenant-Based Rental Assistance
<b>Needs Addressed</b>	Low-Income & Housing Populations
<b>Funding</b>	HOME \$250,000, Sources: Grant
<b>Description</b>	NeighborWorks Alaska will administer Tenant-Based Rental Assistance to low-income individuals and families living in scattered sites located in the Municipality. Chronic homeless and low-income households simultaneously experiencing homelessness with a physical or mental disability, substance abuse, or chronic health condition. The targeted population comprises that segment of the Anchorage homeless population that currently accounts for the highest per capita expenditure rate for police call-outs, emergency room and hospitalization, and Anchorage Safety Center/Safety Patrol encounters. The goal is to continue assisting 36 households in 2022.
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	36 low-income households at or below 50% Area Median Income
<b>Location Description</b>	Scattered sites located in the Municipality
<b>Planned Activities</b>	92.205(a)(1) Eligible activities.

**14. CHDO Operating Assistance – Habitat for Humanity Anchorage**

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Community Housing Development Organization Operating
<b>Needs Addressed</b>	Low-Income & Housing Populations
<b>Funding</b>	HOME \$38,938, Source: Grant
<b>Description</b>	Housing development costs for administration and overhead of the CHDO agency.
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Households with low/moderate-income
<b>Location Description</b>	900 E. Benson Blvd., Anchorage
<b>Planned Activities</b>	92.208 Eligible CHDO Operating Expense and Capacity Building Costs

## 15. ESG Homeless Prevention - ADRC

<b>Target Area</b>	Anchorage
<b>Goals Supported</b>	Homeless Prevention and Rapid Re-housing
<b>Needs Addressed</b>	Homeless Populations
<b>Funding</b>	2022 ESG \$151,506, Source: Grant
<b>Description</b>	Homeless Prevention activities
<b>Target Date</b>	12/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBD
<b>Location Description</b>	825 L St., Anchorage, Alaska.
<b>Planned Activities</b>	24 CFR 576.103 – Homelessness Prevention



## AP-50 Geographic Distribution - 91.220(f)

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### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed.

The following is a description of the Municipality's geographic area for services, which include areas for low-income families and/or racial and minority concentrations where efforts were directed throughout the 2022 calendar year.

The geographic area of the Municipality of Anchorage (Municipality) has a total land area of 1,704.68 square miles and includes Eklutna, Anchorage Bowl, Chugiak, Eagle River, and Girdwood (Turnagain Arm). The Municipality is considered a county under the U.S. Census Bureau and is identified as a unified home rule municipality, which means city government and borough governments are merged. Anchorage is the northern most major city in the United States. According to the U.S. Census Bureau, the estimated population in 2015 in Anchorage is 298,908 residents. Anchorage is the largest city in Alaska and constitutes approximately 41% of the State's total population.

In 2010, the Census showed a total of 32,469 households resided in census tracts with a median household income below 80% of Anchorage's median income. The census tracts below 80% of the area median income included: 3, 4, 5, 6, 7.01, 7.03, 8.01, 8.02, 9.01, 9.02, 10, 11, 14, 17.31, 18.02, 19, 20, 21, and 22.02. According to the Census 2010, Demographic Information for Anchorage shows: White 66.00%, Black 5.60%, American Indian and Alaska Native 7.90%, Asian 8.10%, Native Hawaiian and Other Pacific Islander 2.00%, two or more races 8.10%, Hispanic or Latino origin 7.60%, and White persons not Hispanic 62.60%.

The AK Department of Labor shows the following race by percentage (July 2016):

#### Total 299,037

- White 194,470
- American Indian and Alaska Native 26,003
- Black or African American 18,060
- Asian 28,626
- Native Hawaiian or Other Pacific Islander 7,566
- two or more races 24,312
- Hispanic Origin of any race 26,786

[www.live.laborstats.alaska.gov/pop/estimates/data/RaceHispBCA.xls](http://www.live.laborstats.alaska.gov/pop/estimates/data/RaceHispBCA.xls)

**Table AP-50.1. – Geographic Distribution**

Target Area	Percentage of Funds
Municipality of Anchorage – City Wide	100%

### Rationale for the priorities for allocating investments geographically

To help comply with Fair Housing, the Municipality has designated the entire city as the target area. This allows low-income households to live in any neighborhood and still be eligible to receive assistance from programs based on income. In 2010, the median income

in Anchorage was \$85,200. In 2016 the median income in Anchorage inched to \$87,600. According to the Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, a total of 31,026 households in Anchorage have a household income below \$75,000.

### **Discussion**

The Municipality will not prioritize the allocating of investments geographically as there is a great need for all programs citywide. To do so would prohibit individuals or families from participation in housing or programs based on where they reside. All the programs funded benefit low/moderate income individuals and households. Therefore, the Municipality has chosen not to limit by geography because LMI individuals and households are found throughout the Municipality.



## AP-55 Affordable Housing

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### Introduction

The Municipality of Anchorage (Municipality) has identified goals in the 2022 Action Plan (AP) that provides decent housing by preserving the affordable housing stock and increasing the availability of affordable housing. The 2022 AP lists specific goals and actions that are funded with HOME Investment Partnerships Program (HOME), Community Development Block Grants (CDBG), and the Emergency Solutions Grant (ESG) to work towards achieving these goals. For this section of the Action Plan, affordable housing is rental housing and homeownership. The estimated numbers do not include emergency shelter, transitional housing, or social services.

In the 2022 AP, the Municipality will continue to support the Rural Alaska Community Action Program's Mobile Home Repair Program (MHRP). The MHRP rehabilitates 20 owner-occupied mobile homes whose owners have low- to moderate-incomes (80% Area Median Income or less).

In the 2022 AP, the Municipality will continue to support Habitat for Humanity Anchorage with CHDO HOME funding that will be used for site development, design/engineering and project management, and new construction/rehabilitation for four housing units. The project is scattered sites in Anchorage and will assist new homeowners at or below 80% of low/moderate-income.

The Municipality will continue providing HOME funds to support NeighborWorks Alaska's Tenant-Based Rental Assistance, (TBRA) a rental assistance program that will continue to assist 36 households in 2022. The TBRA program is permanent housing and targets the homeless and extremely to very low-income (30% Area Median Income or less) households simultaneously experiencing homelessness with a physical or mental disability, substance abuse, or chronic health condition.

The following tables show the goals for affordable housing projects funded with FY 2022 funding.

**Table AP-55.1. - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households to be Supported.	
Homeless:	36
Non-Homeless:	21
Special Needs:	0
Total:	57

**Table AP-55.2. - One Year Goals for Affordable Housing by Support Type**

One Year Goals for the Number of Households Supported Through	
Rental Assistance:	36
The Production of New Units:	1

Rehab of Existing Units:	20
Acquisition of Existing Units:	0
Total:	57

**Discussion**

The Municipality is providing affordable housing assistance to renters and homeowners who may be homeless and non-homeless. The programs include the MHRP, the HOME CHDO Housing program, and the TBRA program.

## AP-60 Public Housing

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### Introduction

This information was gathered in consultation with Alaska Housing Finance Corporation (AHFC), the public housing agency for the Municipality. AHFC is a self-supporting public corporation with a mission to provide Alaskans with access to safe, quality, affordable housing. They:

- Provide a variety of affordable housing programs and tools, including the operation of public housing, housing choice vouchers, and project-based assistance;
- Finance housing developments through the Low-Income Housing Tax Credit program, tax-exempt multifamily loans, and the distribution of federal and state housing grants;
- Help reduce energy costs through energy efficiency education, weatherization grants, federal tax credit application assistance, special loans for weatherization, and heating assistance programs for renters; and
- Provide a variety of home loan programs for low- and moderate-income residents, including first-time homebuyers.

AHFC was admitted to the HUD Moving to Work Demonstration program in 2008. All activities must meet one of the three MTW statutory goals:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures;
2. Create incentives for families with children to work, seek work, or prepare for work; and
3. Increase housing choices for low-income families.

Information regarding AHFC's activities can be found in its annual Moving to Work Plans and Reports at <https://www.ahfc.us/publichousing/resources/mtw-plans-and-reports/>. In Anchorage, AHFC operates:

- 627 Public and Multi-family Housing Program units, of which 240 serve elderly/disabled populations exclusively;
- 48 affordable housing units that accept individuals with vouchers;
- 2,290 Housing Choice Vouchers; and
- 157 project-based voucher units.

In addition to its Public Housing, Housing Choice Voucher, and Multi-family Housing Programs, AHFC offers the following specialty programs for very low-income families in the Anchorage jurisdiction.

- Empowering Choice Housing Program – a partnership with the State of Alaska Council on Domestic Violence and Sexual Assault and the Alaska Network on

Domestic Violence and Sexual Assault. This direct referral program offers 95 vouchers to families displaced by domestic violence, dating violence, sexual assault, and stalking. This program is limited to 36 months of rental assistance.

- Mainstream Voucher Program – a partnership with the State of Alaska Department of Health and Social Services. This direct referral program offers 10 vouchers to nonelderly persons with a disability who are at serious risk of institutionalization, transitioning from an institutional setting, at risk of homelessness, or homeless.
- Making A Home Program – a partnership with the State of Alaska Office of Children’s Services. This direct referral program offers 15 coupons to youth aging out of foster care who are participating in an Independent Living Program. This program is limited to 36 months of rental assistance.
- Moving Home Program - a partnership with the State of Alaska Department of Health and Social Services. This direct referral program offers 70 vouchers to persons with a disability receiving supportive services paid for by the State of Alaska.
- Returning Home Program – a partnership with the State of Alaska Department of Corrections (DOC). This direct referral program offers 30 coupons to persons under a DOC supervision requirement. This program is limited to 24 months of rental assistance.
- Veterans Affairs Supportive Housing – a partnership with the Alaska VA Healthcare System (AVAHS). This direct referral program offers 169 vouchers to homeless veterans with case management services provided by AVAHS.
- A partnership with NeighborWorks Alaska to provide subsidy at the Adelaide, a 70-unit Single Room Occupancy building, serving individuals who qualify as homeless under the McKinney-Vento Act.
- A partnership with Rural Alaska Community Action Program, Inc., to provide subsidy at Karluk Manor, a Housing First development, serving 46 chronically homeless persons with substance abuse or alcohol addictions.
- A partnership with Covenant House Alaska to provide subsidy and support services to 25 homeless youth at Dena’ina House.

AHFC promotes self-sufficiency and well-being for people in Anchorage through the following programs.

- After-school programs for children and youth in public housing developments;
- Heavy chore services to frail elderly or disabled families;
- Meals on Wheels program at buildings with elderly and disabled families;
- Educational scholarships;

- Summer camp scholarships for children in the Housing Choice Voucher and Public Housing programs;
- Computer labs that offer family self-sufficiency and educational resources as well as youth educational activities; and
- Jumpstart, an enhanced Family Self-Sufficiency Program, is available to participants of AHFC's rental assistance programs who wish to increase income from employment and decrease dependence on housing assistance.

### **Actions planned during the next year to address the needs of public housing**

AHFC Public Housing Division's vision is for an Alaska where all people have a safe and affordable place to call home. Their mission is to provide the people of Alaska access to safe and sustainable housing options through innovative strategies and programs. As of January 1, 2020, in Anchorage there were over 2,570 families on the Housing Choice Voucher waiting list and over 2,228 on the waiting list for various AHFC-owned rental assistance units.

Many times, the lack of affordable housing in Alaska is most acutely felt by low-income residents. The waiting list in Anchorage indicates that one- and two-bedroom units are in the highest demand, and units that provide accessible features for the disabled are also very much needed. AHFC continues to assess needs, research development and partnership opportunities, and implement strategies that will create financially sustainable housing to meet the needs of low-income Alaskans and increase the number of affordable housing units.

In the coming year, AHFC will continue to modify its units with accessibility features such as enlarged door openings, grab bars in bathrooms and hallways, automatic doors, and removing carpet to facilitate wheelchair movement. For new construction, AHFC complies with ADA-504 on all new construction and renovation projects and ensures that at least five percent of the units, or one unit (whichever is greater), will accommodate a person with mobility impairments.

Lastly, AHFC offers a well-defined Reasonable Accommodation process that covers families from the application process through unit modification requests. Additionally, AHFC offers language interpretation services to those families with limited English proficiency.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

AHFC promotes resident involvement in AHFC activities through both a Resident Advisory Board (RAB) and Resident Councils. The purpose of AHFC's RAB is to provide advice and comment to AHFC on proposed operations, the annual Moving to Work Plan, proposed construction activities, and other items of interest to AHFC's public housing and housing choice voucher clients. The RAB is composed of eleven members, and AHFC conducts four quarterly meetings each year. Minutes and comments received during meetings are reported to AHFC's Board of Directors.

AHFC also encourages the formation of Resident Councils at its Public and Multifamily Housing sites. The purpose of a Council is to encourage resident participation in the quality of life at their complex. All residents that elect to have a Council have opportunities to improve and/or maintain a suitable, safe, and positive living environment through participation in the Council.

AHFC provides a staff person designated to assist in the formation, development, and educational needs of the Councils and offer technical assistance to volunteers. Members are encouraged to conduct regular meetings, discuss resident concerns, and provide feedback to AHFC management on any issues affecting residents in the apartment communities. In the coming year, AHFC plans to invite a member of each Council's board to attend RAB meetings.

AHFC suspended applications for this program in 2008, when administrative costs exceeded budget authority. The Board of Directors approved the permanent closure on March 9, 2011. All homeowners participating at that time kept their assistance. AHFC simply closed the program to new applicants. Given the difficult financial times forecasted for future funding, AHFC does not currently plan to re-visit this program in its current form. Staff are investigating alternate methods of encouraging this activity. Further development of this activity will be tied to future leasing rates and available funds.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Public Housing Authority is not designated as troubled. AHFC is considered a High Performing Public Housing Authority.

**Discussion**

AHFC is the State of Alaska's only Public Housing Authority. Their headquarters is located in Anchorage. AHFC partners with non-profits and agencies in Anchorage and provides funding for many programs/projects. Those activities are listed in its annual plans and reports as well as the detailed list of its housing activities described above.

For its fiscal year ending June 30, 2019, of the 1,201 families admitted into housing programs, 977 (81.3%) were extremely low-income and 212 (17.7%) were very low-income. AHFC will continue to provide affordable housing to extremely low-, very low- and low-income families, seniors, and disabled individuals through its various programs. It will also continue to provide a full-service approach to property management and maintenance. General up-keep and maintenance of property is important for curb appeal and resident satisfaction. Property management and maintenance staff conduct regular site inspections using standard checklists at least annually. Inspections results are used to create plans for capital improvements.

## **AP-65 Homeless and Other Special Needs Activities - 91.220(i)**

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### **Introduction**

The Municipality of Anchorage (Municipality) has identified goals in the 2022 Action Plan (AP) that provide decent housing by transitioning homeless persons and families into permanent housing and increasing the supply of supportive services. The 2022 AP lists specific goals and actions that are funded with HOME Investment Partnerships Program (HOME), Community Development Block Grants (CDBG), and the Emergency Solutions Grant (ESG) to work towards achieving these goals.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The Municipality significantly increased its funding and coordination efforts directed toward unsheltered individuals. In addition to funding the Anchorage Coalition to End Homelessness, who leads the Continuum of Care to coordinate unsheltered outreach efforts, it not only increased the number of outreach workers connecting clients to resources and referrals, but also started funding those workers with flexible housing funds to move unsheltered and newly sheltered individuals into housing.

Moreover, in terms of a COVID-19 response, in the summer, the Anchorage Health Department (AHD) collaborated with the Anchorage Coalition to End Homelessness to generate safety protocols for Outreach workers; and later in the fall, AHD coordinated on the means and methods to test Outreach workers and clients.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

In past years, the Municipality coordinated various levels of emergency response efforts to address people experiencing homelessness (PEH) in this harsh winter climate. In particular, there had been an Emergency Cold Weather Shelter program that was triggered at a certain temperature to ensure (1) overflow space if the shelter census exceeded available beds and (2) families would have a separate location away from single, adult PEH.

In 2019, municipal code was changed to reflect the growing concern of the lack of available shelter beds. Chapter 16.120 Emergency Shelter Plan for Persons Experiencing Homelessness was updated to reflect implementation of measures to coordinate public and private resources when a lack of available shelter options poses an immediate danger to the life and health of unsheltered people within the municipality. It reflected the ability of the AHD Director to declare a public health emergency based on the lack of available shelter beds.

In this event, locations not currently serving as shelters could become temporary shelters contingent upon the providing entity submitting an approved application to the Health Department. This code update removes several barriers: emergency shelters beds are no longer limited to the winter determined by temperatures and instead expands to year-

round options determined by shelter census numbers; local zoning regulations barring shelter services are lifted in this declared emergency, making more of the community available to host these social services; and the public process that often rejects service providers into their neighborhoods was also lifted.

Moreover, during 2020 and 2021, due to the mitigation measures of six-foot spacing in response to the COVID-19 Pandemic the Municipality saw a dramatic decrease in bed capacity across the shelter system. To remedy this, the municipality stood up two emergency congregate shelters as well as multiple non-congregate shelter options serving specialized people experiencing homelessness (PEH) populations, including families; those qualifying for future permanent supportive housing units; those the CDC deemed at high-risk for health; and those in isolation and quarantine.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again:**

One of the biggest challenges to helping homeless persons transition to permanent housing is lack of affordable housing. The Municipality continues to support decent affordable housing by funding the NeighborWorks Alaska's Tenant-Based Rental Assistance program that assists 36 households at 50% Area Median Income with rental and down payment assistance for up to 2 years. These are households' simultaneously experiencing homelessness with a physical or mental disability, substance misuse, and chronic health condition.

The Municipality is providing an ESG grant for HMIS Lead Activities to enhance reporting and coordination capabilities among homeless providers.

The Municipality works with the Continuum of Care (CoC) to assist homeless persons, especially the chronically homeless individuals, veterans and their families, as well as unaccompanied youth.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The Municipality funds the Rapid Re-Housing program operated by Catholic Social Services (CSS) to provide rent and down payment assistance to low-income households at 30% Area Median Income who are homeless or at-risk of homelessness by helping them to quickly be re-housed and stabilized.



Systems of care and publicly funded institutions discharge persons into homelessness, such as healthcare and mental health facilities, foster care, and corrections programs. State, local, and private and public agencies work in consortium to aid homeless and at-risk of homelessness households by assisting and counseling them. There are many services provided, such as fair housing with landlords; health and social services to children, elderly, disabled, veterans, and persons with HIV and their families; in addition to other special groups affected into homeless or at risk of homelessness.

Agencies work tirelessly on the methods of distribution of assistance within the community. Homelessness is a community wide effort. Members of the CoC ranked homeless families with children and youth as the highest priorities. Efforts by government programs, non-profit agencies, businesses and the public were formulated to create standard intake processes; increases to funding for more low-cost affordable housing; better access to prevention services, and funding for medical and behavioral treatment.

ESG has benefited from the Coordinated Entry efforts by assisting in the development of policies, performance standards, program evaluations, and coordinating housing services funding for homeless families and individuals.

With ESG-CV Rapid Re-Housing (RRH) services, CSS assists families living in shelters or in places not meant for human habitation to move into permanent housing as quickly as possible. RRH households must have a reliable income source that will sustain housing. ESG assists families for three months, if there are extenuating circumstances and funds are available, assistance up to six months may be considered. Community Based case management provides intensive case management and limited financial resources and referrals to additional community resources. RRH services limits the family's contribution towards rent, capping contribution at 30% of income.

CSS Homeless Family Services work with multiple outside agencies and service providers to service households experiencing homelessness. Outside agencies must provide a Release of Information for each participant for open communication between parties to occur. Regular weekly check-in meeting must occur to ensure appropriate service delivery.

A Self-Sufficiency or Housing Stability Plan is established for each family. Each household must be able to independently maintain permanent housing after program assistance has ended. Applicants can receive case management services up to 90 days, as long as they are compliant with the rights and responsibilities outlined in the ESG program.

A review of eligibility is conducted every six months. Discharge planning begins at intake. The participant will complete an after-care/follow-up form during the intake process that specifies their desire for case management follow-up after discharge. Community partners and landlords working with the participant continue to be a part of the community partners.

CSS is in the process of revamping the RRH program model to an evidenced based model called Critical Time Intervention (CTI). CTI recognizes people need the most support during times of transition. Services can last three months to one year, depending on the grant(s) and the level of the participant's self-sufficiency.

A renter household in Anchorage needs 1.5 full-time jobs at average renter wage to afford a two-bedroom unit at fair market rent. This high cost of rental housing is part of why an estimated 33 percent of all households in the Municipality of Anchorage are cost-burdened, meaning they spend more than 30 percent of their income on housing. Housing is even less affordable for the lowest income residents; to afford a two-bedroom rental unit at fair market rent, a renter earning minimum wage would need to work 102 hours per week as per 2017 Housing Assessment.

The Municipality also funds the Homeless Prevention program operated by the Municipality's Aging and Disabilities Resource Center to provide financial assistance with rent, rental and utility arrearages to low-income households at 30% Area Median Income. The program will prevent households from becoming homeless and regain stability in permanent housing.

It also provides housing relocation and stabilization services and short-term rental assistance as necessary to prevent the household from moving into an emergency shelter, a place not meant for human habitation or another place of the homeless definition. The cost of homeless prevention is only eligible to the extent that the assistance is necessary to help the participant to regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

The Municipality funds the Public Services program operated by Alaska Legal Services Corporation that provides assistance to 350 low-income individuals and families that are at-risk of becoming homeless. The legal assistance is aimed at immediately increasing at-risk individuals and family's safety and stability by keeping or securing housing, obtaining orders of protection and assisting with income problems, such as: securing child support and public benefits.

## **Discussion**

The goals and activities described above to reduce and end homelessness in the Municipality are contingent upon stable funding from the HUD HOME, CDBG, ESG, and HTF funds. In 2020, however, the municipality started prioritizing more of its operational dollars towards homelessness, both funding projects as well as funding a new work group in the Anchorage Health Department to focus on housing and homeless services. The Municipality will continue the following activities to help end homelessness in Anchorage.

- Coordinate with partners to support community efforts that link veterans to case management and housing services.
- Coordinate with the CoC to seek strategies and actions that improve Coordinated Entry to housing and services.
- Work with community partners to link individuals and families to mainstream support services, such as public assistance, Medicaid/Medicare, and veterans support services.

- Reduce homelessness by increasing the availability of affordable housing, so individuals and families can move off the streets, out of shelters, and into permanent homes.



## AP-75 Barriers to Affordable Housing

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### Introduction

As mentioned in the Consolidated Plan, the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the Municipality. Such policies include:

- Title 21 zoning ordinance residential design standards
- Regulatory processes including permits and approvals
- Accessory-dwelling-units (ADU) regulations
- Zoning ordinance regulations limiting the size, type, and number of residences
- Building codes
- Fees and charges
- Parking and driveway requirements
- Infrastructure standards and requirements
- Off-site improvements requirements

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

During the period of this Action Plan and the 2018-2022 Consolidated Plan, the Municipality plans to do what it can to remove or ameliorate the negative effects of public policies that may serve as barriers to affordable housing.

Since 2015, the municipal Planning Department has worked with the development community to amend the Title 21 zoning ordinance residential design standards that the development community has identified as the most costly (relative to public benefit) or difficult to adhere to. These include, amending the residential design standards, no longer requiring storage areas, and organizational changes that simplify and shorten the regulations. Menu choices and standards are becoming clearer and easier to comply with, more flexible and less prescriptive.

In 2017, the Assembly adopted the Anchorage 2040 Land Use Plan (2040 LUP). One of the main objectives of the plan is to make sure that enough land is designated to accommodate anticipated housing needs, including more compact housing types. The Planning Department included as a factor the need for equity in the geographic distribution of compact housing types that tend to be more affordable and transit oriented. The municipal Planning Department has assisted the Real Estate Department to evaluate the best use of the limited Municipal owned lands in the Municipality of Anchorage for housing development. Examples of this include the former Federal archive site in Midtown and the Municipal owned lands on the southwest corner of Tudor and Elmore Road, which the Municipality rezoned to mixed-use to accommodate a forecast 200+ dwelling units along with commercial and community uses. Private property owners have also rezoned lands designated in the 2040 Land Use Plan for compact housing, including the Dimond/Sand

Lake Polen Park rezoning in 2019 that added 7.5 acres of buildable R-2M zoned land with a forecast capacity of 50+ duplex/attached dwelling units. A rezoning of the former Native Hospital site on 3rd Avenue from PLI to B-2C is anticipated to accommodate a mix of community, commercial, and residential uses.

In 2019, the Municipality adopted a tax abatement ordinance for the Central Business District to foster new housing development in the downtown area. The tax abatement allows for up to 12 years of tax relief for newly constructed residential units.

**Does the Municipality’s comprehensive plan include a “housing element? A local comprehensive plan means the adopted official statement of a legislative body of a local government that sets forth (in words, maps, illustrations, and/or tables) goals, policies, and guidelines intended to direct the present and future physical, social, and economic development that occurs within its planning jurisdiction and that includes a unified physical plan for the public development of land and water.**

The Municipality comprehensive plan consists of a series of four overarching plans: Anchorage 2020—Anchorage Bowl Comprehensive Plan (AB 2020), Chugiak-Eagle River Comprehensive Plan (CE), Girdwood Area Plan (GAP), and the Turnagain Arm Comprehensive Plan (TA). Further amplification of these four plans may be found in area specific plans as well as functional plans addressing infrastructure, parks, open space, historic preservation, and natural resource management. The issue of housing is interwoven throughout the comprehensive plan along with such issues as future land use, transportation, and open space. The Anchorage Bowl Comprehensive Plan (AB 2020) includes Policy #56, which guides the development of the Housing & Community Development Consolidated Plan in terms of the location and density of housing development. AB 2020 calls for a more focused and compact form of development than had been traditionally found in Anchorage. Subsequent area specific plans have forwarded this focus and provide greater specificity in types of housing, density, their planned location, and the design and character of desired for new housing development.

The 2017 adopted Anchorage 2040 Land Use Plan (2040 LUP) supplements the AB 2020 Plan and is an element of the comprehensive plan. The 2040 LUP sets the stage for future growth and development, with an emphasis on future housing needs. The 2040 LUP incorporates the adopted area specific plans, public facility plans, and recent analyses regarding population, housing, commercial, and industrial needs over the next 25 years. The 2040 LUP has a housing Goal (Goal #4) to meet the housing needs of all and adds additional policies to encourage and guide the development of housing. It also includes recommended strategies to carry out the plan and manage growth including strategies to help reduce the cost of housing and alleviate the workforce housing deficit. Actions 4-1 through 4-19 in the Plan are focused on housing. Of 70 near-term Actions in the plan to occur within the 2022 Consolidated Plan horizon, more than a dozen housing-related actions have been completed or are underway. For example, Action 2-6 called for the development of a new mixed used zoning district. This was accomplished in 2018 through the adoption of the R-3A zoning district, which promotes mixed use development near town centers that are served or planned to be served by transit. During this same period,

the Municipality amended the rules governing Accessory Dwelling Units (ADU) to allow this type of housing in more of its residential districts as well as increasing the allowed size of these units. ADU's can be attached, above a garage or detached, as long as the design follows specific setback, size and parking requirements. In the last several years, both attached and detached ADUs have become a permitted use in all residential districts in the Anchorage Bowl. The Planning Department began tracking ADU permits in 2017 and the objective is to promote an increase in production from approximately 20-25 annually (2015-2019) to 1,000 total ADUs by 2040.

**If the Municipality has a comprehensive plan with a housing element, does the plan provide estimates of current and anticipated housing needs, taking into account the anticipated growth of the region, for existing and future residents, including low, moderate and middle-income families, for at least the next five years?**

Chapter Two of Anchorage Bowl Comprehensive Plan (AB 2020) includes an analysis of the local population, economy, land use, forecasts for planning and infrastructure needs over a twenty-year time horizon. The Consolidated Plan estimates the housing needs of low- and low- to-moderate-income households.

The Anchorage 2040 Land Use Plan (2040 LUP) includes an updated housing sufficiency analysis forecasting the housing needs by housing type through the year 2040. The 2040 LUP encourages a range of housing types to meet those needs, with specific targets for compact and multifamily housing types. The 2040 LUP includes actions to review and amend zoning standards such as parking requirements, building heights, minimum lot sizes, and mixed-use regulations to further encourage housing development.

**Does the Municipality zoning ordinance and map, development and subdivision regulations or other land use controls conform to Municipality's comprehensive plan regarding housing needs by providing: a) sufficient land use and density categories (multifamily housing, duplexes, small lot homes and other similar elements); and, b) sufficient land zoned or mapped "as of right" in these categories, that can permit the building of affordable housing addressing the needs identified in the plan? (For purposes of this notice, "as-of-right," as applied to zoning, means uses and development standards that are determined in advance and specifically authorized by the zoning ordinance. The ordinance is largely self-enforcing because little or no discretion occurs in its administration.)**

Title 21, Anchorage's zoning code was overhauled in 2013. Title 21 includes updated standards that promote and encourage redevelopment and infill development with higher land use densities and intensities. It provides a range of multifamily districts allowing moderate, medium, and high-density housing types—both market and affordable—by right. The Municipality is currently preparing amendments to the district-specific development regulations in several multifamily zoning districts, such as the R-2M and R-4A zones, to address the housing needs identified in the 2040 Land Use Plan adopted in 2017.

The Municipality is updating the city Zoning Map incrementally to conform to the Anchorage 2040 Land Use Plan (2040 LUP) land use plan and meet the housing needs.

Strategies include targeted Area Rezones that the Municipality can carry out to facilitate area-specific changes in the Zoning Map to allow more housing and mixed-use where called for in the 2040 LUP.

The Municipality is further implementing the 2040 Land Use Plan by developing the Reinvestment Focus Area (RFA) program. Once in place, the RFA will focus and coordinate municipal actions including development incentives, infrastructure investments, and implementing procedures to catalyze private sector reinvestment and support infill and redevelopment in strategic areas of Anchorage. Included is a focus on increasing new housing development on vacant infill lots and redevelopment of underused buildings and sites in or near centers and transit corridors.

**Does the Municipality’s zoning ordinance set minimum building size requirements that exceed the local housing or health code or is otherwise not based upon explicit health standards?**

The building code sets minimum dwelling unit sizes, while the zoning ordinance (Title 21) sets minimum lot sizes per number/type of housing units. The zoning ordinance does not set minimum building size requirements.

**If the Municipality has development impact fees, are the fees specified and calculated under local or state statutory criteria? If yes, does the statute provide criteria that sets standards for the allowable type of capital investments that have a direct relationship between the fee and the development (nexus), and a method for fee calculation?**

The Municipality does not charge impact fees but it does require off-site improvements to streets and utilities as needed and in proportion to the development’s off-site impacts.

**If the Municipality has impact or other significant fees, does the jurisdiction provide waivers of these fees for affordable housing?**

N/A

**Has the Municipality adopted specific building code language regarding housing rehabilitation that encourages such rehabilitation through graduated regulatory requirements applicable as different levels of work are performed in existing buildings? Such code language increases regulatory requirements (the additional improvements required as a matter of regulatory policy) in proportion to the extent of rehabilitation that an owner/developer chooses to do on a voluntary basis.**

Any modifications (rehabilitation) of a building must meet the International Existing Building Code. Any modification (rehabilitation) of a building for the purposes of a voluntary seismic upgrade does not have to fully meet code but it does have to move toward compliance and avoid making conditions worse.

**Does the Municipality use a recent version (i.e. published within the last 5 years or, if no recent version has been published, the last version published) of one of the nationally recognized model building codes (i.e. the International Code Council (ICC), the Building Officials and Code Administrators International (BOCA), the Southern Building Code Congress International (SBCI), the International Conference of Building Officials (ICBO),**



**the National Fire Protection Association (NFPA) without significant technical amendment or modification.**

The Municipality has adopted the 2012 International Building Code (IBC) with modifications. The Fire Department uses NFPA standards that are referenced in the adopted IBC and IFC. Amendments have been adopted for both codes. The IBC has not been amended to disallow the requirements for sprinklers; however, the International Residential Code has. The IRC addresses single-family and duplexes. The Fire Department has limited jurisdiction with the IRC and that does not include residential sprinklers.

**Alternatively, if a significant technical amendment has been made to the above model codes, can the jurisdiction supply supporting data that the amendments do not negatively impact affordability.**

Unknown.

**Does the Municipality's zoning ordinance or land use regulations permit manufactured (HUD-Code) housing "as of right" in all residential districts and zoning classifications in which similar site-built housing is permitted, subject to design, density, building size, foundation requirements, and other similar requirements applicable to other housing that will be deemed realty, irrespective of the method of production?**

Yes, Title 21 allows manufactured and pre-fab housing by right, if it has permanent foundation and meets zoning requirements such as height limits, setbacks, etc. generally applicable to stick-built housing.

**Within the past five years, has an official (i.e., mayor, city manager, administrator, etc.), the local legislative body, or planning commission, directly, or in partnership with major private or public stakeholders, convened or funded comprehensive studies, commissions, or hearings, or has the jurisdiction established a formal ongoing process, to review the rules, regulations, development standards, and processes of the jurisdiction to assess their impact on the supply of affordable housing?**

Yes, the Municipality is working to address these regulatory process and land use codes barriers as resources allow, in part through the 2040 Anchorage Land Use Plan (2040 LUP) and its policies and action items. Some of these efforts, listed in order of most recent first, include:

The Municipality is currently developing a Reinvestment Focus Area (RFA) program that furthers the goals of the 2040 LUP for housing. RFAs are key areas that are able to absorb more housing and employment density, are locations where the community wants to see growth, is served by transit, have most of the utilities needed in place, but require public partnership assistance to address site development challenges such as rights of way improvements, rezoning, platting etc.

The Municipality is also currently preparing amendments to the zoning ordinance to reduce minimum parking requirements and driveway width requirements in urban parts of the city, including areas with sidewalks and frequent transit service; to allow even further parking reductions by-right for affordable housing projects; and to adjust building height

and other dimensional standards in the R-2M, R-3, R-4A, and DT (Downtown) zoning districts to reduce barriers to housing.

In 2015-2017 the Municipality updated major parts of its 2012 analysis of housing demand in Anchorage. The 2017 adopted 2040 LUP updates the 2012 housing capacity and needs analysis through the year 2040. It corroborated the 2012 Analysis that there is a continued significant shortage of housing, especially in the multi-family and compact housing types, and recommended measures in response. Many factors affect the supply of housing in Anchorage, including the fact that overall construction costs create a significant feasibility gap for medium and high-density housing. The 2012 and 2015 analyses identified regulatory processes as one of several factors that local government could directly and quickly correct. The 2040 LUP includes measures for housing such as making reduced parking requirements for rental housing by-right, allowing for smaller lot sizes, more compact housing, and Accessory-Dwelling-Units, facilitate redevelopment of blighted areas, and plan for the potential redevelopment of mobile home parks.

In 2015 the Alaska Mental Health Trust Authority and the United Way of Anchorage funded a fair housing analysis on behalf of the Municipality. The Analysis of Impediments to Fair Housing study found that Anchorage's housing challenge affected residents at all economic levels, with lower-income and minority rental households the most seriously impacted.

The current Administration has also designated a Housing Coordinator in the Real Estate Department whose primary focus is to encourage housing development on underutilized or vacant City owned lands. The Housing Coordinator will be issuing a Request for Proposals in 2019 for a nine-acre Municipal owned site located in the Midtown area, a major employment center. This prime located site is designated under the 2040 LUP for mixed used development and will require a minimum of 20 dwelling units per acre and allow up to 40 dwelling units per acre through a bonus point system.

**Within the past five years, has the Municipality initiated major regulatory reforms either because of the above study?" If yes, attach a brief list of these major regulatory reforms.**

The Municipality overhauled its zoning ordinance, called Title 21, in 2013. The new code introduced lower parking requirements, administratively available parking reductions, narrow lot housing, Accessory-Dwelling-Units, and density and parking incentives for affordable / transit supportive housing. As users have developed projects under the new Title 21, amendments have been made or are underway to address adding greater flexibility in parking standards for small lot subdivisions, and other adjustments.

The 2040 LUP, adopted in 2017, identified more than a dozen near-term housing-related changes to the development regulations. Several have been completed and an additional half-dozen are underway.

**Within the past five years has the Municipality modified infrastructure standards and/or authorized the use of new infrastructure technologies (e.g. water, sewer, street width) to significantly reduce the cost of housing?**

Some are underway and more are called for in 2040 LUP. The Anchorage Water and Wastewater Utility (AWWU) is conducting an analysis of its rate setting processes to develop greater flexibility in the approval of water and wastewater infrastructure improvements. Presently, AWWU has limited means to authorize new infrastructure technologies to significantly reduce the cost of housing.

The Municipality is also in the process of studying the establishment of a stormwater utility, which would handle maintenance and improvements to the city's aging stormwater pipe infrastructure. The stormwater utility, once established, is anticipated to have a beneficial effect on housing development costs as more infrastructure is maintained or repaired in a systematic way, as opposed to new developments having to make off-site improvements in order to have adequate stormwater management.

The annual Capital Improvement Program (CIP) includes scoring and ranking nominated road, surface water and park improvements to develop each year's proposed CIP for Assembly. The Scoring process now includes a category to score how projects can better serve Reinvestment Focus Areas. By adding this Reinvestment Focus Area category to the CIP process, it will help identify those CIP projects that should be funded to support these targeted growth areas and further support housing growth as well as capitalize on other public investments that have already been made in previous years in the area.

**Does the Municipality give "as-of-right" density bonuses sufficient to offset the cost of building below market units as an incentive for any market rate residential development that includes a portion of affordable housing? (As applied to density bonuses, "as of right" means a density bonus granted for a fixed percentage or number of additional market rate dwelling units in exchange for the provision of a fixed number or percentage of affordable dwelling units and without the use of discretion in determining the number of additional market rate units.)**

Title 21 offers as-of-right density bonuses for increases in floor-area-ratio (FAR) for affordable rental housing. These apply in the two highest-density residential zoning districts. The amount of floor area bonus is directly tied to the amount of floor area of affordable rental housing. The affordable housing receiving the bonus must meet three non-discretionary (as of right) standards: be at least partly above grade to have windows, be intermingled with market units in the project, and be indistinguishable in appearance from market units.

Floor area/height bonuses are also provided in return for household living uses in the central business district (DT) zones. These bonuses are being updated as part of an ongoing set of projects to update the DT zoning regulations. The bonuses will be calibrated to reflect existing housing development costs as well as the additional public value of affordable (as opposed to market-rate) housing.

The Municipality is amending its parking reductions for affordable rental housing (meeting HUD affordable definitions) to make those reductions “as of right” rather than subject to the discretion of municipal officials.

**Has the Municipality established a single, consolidated permit application process for housing development that includes building, zoning, engineering, environmental, and related permits? Alternatively, does your jurisdiction conduct concurrent, not sequential, reviews for all required permits and approvals?**

Yes, these permits are administered through the building permit process. Development Services Department (Building Safety Division) receives the permit application and distributes copies to the various agencies for review, including Land Use, Fire, Traffic, etc. The Municipality can conduct concurrent reviews for some of the required permits and approvals. The 2040 LUP calls for formalizing “permit assistance teams” for housing.

The Municipality is currently developing a Small Area Implementation Plan (SAIP) process to allow for non-institutional master plans. The SAIP provides an alternative to the procedures and design standards of Title 21 (Municipal Land Use Code) for landowners seeking to develop large, complex sites with multiple buildings, transportation features, site constraints etc. An approved Master Plan will streamline future land use review processes as phased development occurs.

**Does the Municipality provide for expedited or “fast track” permitting and approvals for all affordable housing projects in Anchorage?**

Not formally, but does have this ability if requested. This strategy is planned to be considered as part of an implementation Action identified by the 2040 LUP. In response to inquiries by local developers and the general public, the Municipality researched its development permit review times relative to those of other cities in the U.S., and found that the Municipality has one of the fastest permit review times for a jurisdiction of our size in the nation. For example, residential project applicants receive zoning plan review comments in 5 days or less, and commercial project applicants receive zoning comments in 10 days or less.

**Has the Municipality established time limits for government review and approval or disapproval of development permits in which failure to act, after the application is deemed complete, by the government within the designated time, results in automatic approval?**

Yes.

**Does the Municipality allow “accessory apartments” either as: a) a special exception or conditional use in all single-family residential zones or, b) “as of right” in most residential districts otherwise zoned for single-family housing?**

Yes, and is expanding these with an Anchorage 2040 Land Use Plan (2040 LUP) target of 1,000 accessory-dwelling-units (ADUs) over next 25 years. An amendment to the ADU regulations was adopted by the Anchorage Assembly in 2018. ADU units are now allowed in all residential zoning districts as well as an increase in the maximum allowed size of the

ADU. Further amendments and ADU assistance are under consideration under the umbrella of 2040 LUP Actions 4-7 and 4-9.

**Does the Municipality have an explicit policy that adjusts or waives existing parking requirements for all affordable housing developments?**

Yes, Traffic Engineer and Planning Director may approve a 15 to 30 percent reduction to the number of required off-street parking spaces for each affordable housing unit (meeting HUD affordable definitions). 2040 LUP Action 4-3 addresses parking requirements through finding ways to streamline approvals for a reduced number of parking spaces for housing developments and to create some additional reductions when certain criteria is met. The Municipality is amending its parking reductions for affordable rental housing to make those reductions “as of right” rather than subject to the discretion of municipal officials.

**Does the Municipality require affordable housing projects to undergo public review or special hearings when the project is otherwise in full compliance with the zoning ordinance and other development regulations?**

No.

**Discussion**

The public process for the 2040 LUP, and its adoption in 2017 and implementation by the Anchorage Assembly and Administration, has helped this community prioritize specific housing targets, goals, and strategies in an integrated framework for action. A range of actions specifically designed to produce and preserve more housing are prioritized by this plan, with more than a dozen actions either completed or underway. Recent improvements include allowing ADUs in all residential zones, allowing innovative small-lot housing subdivisions such as “unit lot subdivisions”, and passing tax incentives for housing in strategic areas of town. Current projects to reduce parking and driveway requirements, adjust multifamily zoning district-specific dimensional standards, update the Downtown zoning regulations, establish reinvestment focus areas, establish a stormwater utility, and allow more kinds of compact housing are anticipated to have positive effects.

The Municipality will continue to provide information to developers and project sponsors on how to comply with accessibility guidelines. HOME funding automatically requires the minimum of 5% accessible and 2% site and sound unit thresholds.

The Municipality grant agreements have requirements to affirmatively further fair housing.

The Municipality displays the Fair Housing Poster in its office and reasonable accommodation requests are encouraged in all communication regarding public meetings.



## **AP-85 Other Actions - 91.220(k)**

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### **Introduction**

The limited amount of funding provided to the Municipality of Anchorage (Municipality) through HUD programs is not sufficient to solve the affordable housing or homeless issues in Anchorage. It will take collaboration and support from several organizations to succeed with these priorities. The Municipality coordinates its efforts with the Anchorage Coalition to End Homelessness (ACEH), Continuum of Care (CoC) partners, State Department of Health and Social Services, Alaska Mental Health Trust Authority, Alaska Housing Finance Corporation (AHFC) and non-profit agencies serving individuals and families who may be low-income, homeless or a person with special needs.

### **Actions planned to address obstacles to meeting underserved needs**

The main obstacle that the Municipality has is the lack of funding. The limited HUD funding has made it difficult for the Municipality to fund projects in the community to solve the lack of affordable housing, the chronic homeless population and supportive services to individuals and families to help them from becoming homeless. For all projects in the 2022 Action Plan, the Municipality is working with partners to leverage federal and State funds to meet the underserved housing needs of individuals and families in Anchorage.

### **Actions planned to foster and maintain affordable housing**

In the 2022 Action Plan (AP), the Municipality will foster affordable housing by funding one affordable housing project, Dukes Place. Also, the Municipality will continue to fund the Rural Alaska Community Action Program's Mobile Home Repair Program for health and safety rehabilitation to maintain mobile homes owned by low/moderate-income families.

### **Actions planned to reduce lead-based paint hazards**

Lead-based paint (LBP) in Anchorage's housing continues to be a rare occurrence. Nevertheless, all HOME Investment Partnerships Program (HOME), Community Development Block Grants (CDBG), and Housing Trust Fund (HTF) funded programs dealing with rehabilitation of older homes include funds to address LBP according to Part 35 regulations. The Municipality will continue to collaborate as appropriate with State and local agencies, nonprofit groups, and the private sector to reduce housing related LBP hazards, especially for low-income families and children. The Municipality has developed LBP Policies and Procedures in compliance with 24 CFR 35 (LBP Poisoning Prevention in Certain Residential Structures) which are incorporated into all its programs. These include acquisition and rehabilitation programs funded by CDBG, HOME, and HTF. Where program specific policies impose funding caps per client or per unit, these caps may be waived when costs required address LBP testing, evaluations, assessments and mitigation cause the project to exceed program limits.

### **Actions planned to reduce the number of poverty-level families**

In the 2022 AP, the Municipality will reduce the number of poverty-level families by funding two programs. The Tenant-Based Rental Assistance (TBRA) program will help the

homeless individuals and families with disabilities with rental assistance to keep them housed until permanent rental assistance becomes available. The Homeless Prevention and Rapid Re-housing programs assist individuals and families who are at risk of homelessness due to short-or medium-term crisis or have been homeless for a short-term. These individuals and families need short-or medium-term financial assistance for preventing evictions, utility shut-offs or down payment for starting a new rental lease.

### **Actions planned to develop institutional structure**

The Anchorage Health Department (AHD) administers the CDBG, HOME, Emergency Solutions Grant (ESG), and Housing Trust Fund (HTF) funds for the Municipality. The Community Safety and Development (CSD) Program within the Human Services Division directly administers these grants.

The Municipality coordinates monthly with the Housing Homeless and Neighborhood Development (HHAND) Commission, Anchorage Women’s Commission, Anchorage Senior Citizens Advisory Commission and the Anchorage American's With Disabilities Act Advisory Commission. The Division Manager sits on the Board of Directors for the ACEH (CoC).

The Division and Program coordinate with other Municipal departments including Project Management and Engineering (PME), Real Estate (RE), and Planning in planning for future housing and public service projects. CSD also works with Purchasing and Risk Management to establish subrecipient agreements as needed.

The Anchorage Health Department (AHD), Emergency Preparedness Program administers the Municipality’s Operations Plan that provides guidance for disaster preparedness, protection, response, and recovery from public health related disasters that occur in or impact the Municipality. Following the magnitude 7.1 earthquake that hit Southcentral Alaska on November 30, 2018, Anchorage Health Department representatives met multiple times with the Municipal Emergency Management Department to discuss earthquake recovery needs and plan for the possibility of the state and/or the Municipality receiving CDBG-Disaster Recovery funds.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The ACEH (CoC), a non-profit organization comprised of providers of homeless services that come together to address homelessness as a partner with the Municipality.

In 2020, the Municipality continued to coordinate its efforts with the HHAND Commission, the ACEH, CoC partners, Alaska Department of Health and Social Services, Alaska Mental Health Trust Authority, Alaska Housing Finance Corporation and non-profit, public and private housing agencies and social service agencies.

### **Discussion**

The Municipality is continually looking for ways to improve institutional structure and meeting underserved needs. Every effort is made to enhance coordination between public and private housing and social service agencies.



## **AP-90 Program Specific Requirements - 91.220(I)(1,2,4)**

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### **Introduction**

The jurisdiction must describe activities planned with Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds expected to be available during the year. All such activities are also included in the projects section.

### **CDBG, HOME, ESG, and HTF**

- Mobile Home Repair Program – Rural Alaska Community Action Program - Renovate owner occupied mobile homes with CDBG funding.
- Rental Housing Development – Cook Inlet Housing Authority – Acquisition/Rehabilitation of rental housing with Home funds.
- Public Facilities – Suitable living environments and non-housing community development
- CDBG, HOME and HOME CHDO Housing Program(s)
- Tenant-Base Rental Assistance – NeighborWorks Alaska – CDBG funds
- Operating Expense Assistance – NeighborWorks Alaska – HOME funds
- Homeless Prevention and Rapid Rehousing Program – The Municipality administers the Homeless Prevention Program and Catholic Social Services administers the Rapid Rehousing Program – ESG Funds

### **CDBG Public Services**

- Public Services – Rural Alaska Community Action Program – Provide case management to persons who were recently homeless in Sitka Place, permanent housing, and who may have chronic alcoholism and other disabilities.
- Public Services – Alaska Legal Services Corporation – Provide direct legal assistance to individuals and families at-risk of homelessness.
- Public Services – Rural Alaska Community Action Program - Provide a bridge between homeless services in the community to ensure that individuals experiencing homelessness have access to needed resources and are connecting with housing.
- Public Services – TBD

### **Community Development Block Grant CDBG**

#### **Reference 24 CFR 91.220(I)(1)**

**Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies Program Income that is available for use that is included in projects to be carried out.**

**Table AP-90.1. – CDBG Program Income**

	<b>Amount</b>
1. The total amount of Program Income that will have been received before the start of the next program year and that has not yet been reprogrammed.	\$0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	\$0
3. The amount of surplus funds from urban renewal settlements.	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0
5. The amount of income from float-funded activities.	\$0
Total Program Income	\$0

**Other CDBG Requirements**

**Table AP-90.2. - Estimated Percentage of National Objective Benefits**

	<b>Amount</b>
1. The amount of urgent need activities.	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low- and moderate-income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low- and moderate-income. Specify the years covered that include this Annual Action Plan.	100.00% +

**HOME Investment Partnership Program (HOME)**

**Reference 24 CFR 91.220(I)(2)**

**The jurisdiction must describe activities planned with HOME funds expected to be available during the year. All such activities should be included in the Projects screen. In addition, the following information should be supplied:**

**1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

The Municipality does not intend to use other forms of investment beyond those identified in Section 92.205.

**2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

**Resale/Recapture Provision**

The Municipality is only establishing a recapture provision. Resale requirements for ensuring affordability are not being implemented.

### **A. Recapture Model: Recapture Entire Amount**

Recapture applies to the down payment and closing-cost assistance loans to homebuyers in conjunction with the Homebuyer Development Program, funded by the HOME Investment Partnerships Program (HOME) in the 2017 Annual Action Plan, being initiated with Habitat for Humanity Anchorage. The Homebuyer Development Program, a CHDO program, provides direct assistance to homebuyers through loans for down payment and closing costs.

Loans shall be non-forgivable, at 0% interest, with the HOME loan amount due and payable upon alienation. There are no payments associated with these loans. The Municipality shall enforce the loans through deeds of trust and deed of trust notes. The loans continue past the HUD affordability periods and are not assumable. Buyers may sell at any time with no limits on the sale price.

Limitation: When repayment is initiated by a sale (voluntary or involuntary) of the property, and there are no net proceeds or the net proceeds are insufficient to repay the HOME loan balance, the amount recaptured will be limited to the net proceeds, if any. The net proceeds are the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

Two examples: A voluntary sale that results in insufficient funds may include a sale when changing location for a job. An involuntary sale may include foreclosure by a superior mortgage-holder.

Alienation: Alienation occurs when the homeowner ceases to live on the property for any reason including sale of the property; death of the assisted homebuyer; or vacating the property for a job change, marriage, or for any other purpose.

HOME regulations require the assisted homebuyer to live in the residence for the entire affordability period. The recapture provision is a requirement of the HOME Program that ensures the funds are assisting qualified individuals or families.

### **B. Amount Subject to Recapture**

Only the direct subsidy to the homebuyer (i.e., the down payment and closing cost assistance) is subject to recapture. Development subsidies are not considered.

### **3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

A description of the Municipality's guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds is the same as the description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities. See description above.

### **4. Market Conditions Indicating the Need for TBRA**

The Municipality certifies that an assessment has been completed of market factors, and because there is an ample supply of housing, a Tenant-Based Rental Assistance (TBRA) program is an effective way to expand affordable housing opportunities for the

community. The lack of affordable housing in the Anchorage area is evidenced by the very low vacancy rates which have caused rents to increase. The average rent for a one-bedroom apartment in Anchorage increased 13% from \$1,112 in 2015 to \$1,259 in 2016. (Rental Survey by Alaska Department of Labor and Workforce Development). As of June 2016, in Anchorage there were over 262 families on the Housing Choice Voucher waiting list and over 5,461 on the waiting list for various Alaska Housing Finance Corporation (AHFC) -owned rental assistance units statewide.

TBRA is essential to meeting the unmet needs of special needs and at-risk populations by providing opportunities for those seeking a way out of homelessness. AHFC cannot issue TBRA vouchers in the Municipality and the rental assistance programs currently available through AHFC for chronic homeless have all been leased and have waiting lists (Moving Home Program and Veterans Affairs Supportive Housing).

The Municipality has identified the need to provide TBRA to eligible households that are at or below 50% of the median area income. Preference is given to special needs populations identified in AHFC's Moving Home Voucher Program. Case Managers have been able to successfully engage the chronically homeless and introduce the Housing First concept to them, only to be let down later over the time it takes to obtain permanent long-term rental subsidy. TBRA is intended to fill this gap by providing temporary rental assistance while waiting for an AHFC voucher to be processed or while waiting for their name to come up on the waiting list.

NeighborWorks Alaska administers Tenant-Based Rental Assistance to low-income persons living in the Municipality. Chronic homeless and low-income households' simultaneously experiencing homelessness with a physical or mental disability, substance abuse, or chronic health condition. The targeted population comprises that segment of the Anchorage homeless population that currently accounts for the highest per capita expenditure rate for police call-outs, emergency room and hospitalization, and Anchorage Safety Center/Safety Patrol encounters.

**5. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

There are no plans for refinancing existing debt with HOME funds.

**Emergency Solutions Grant (ESG)**

**Reference 91.220(l)(4)**

**1. Included written standards for providing ESG assistance (may include as attachment)**

Written standards for providing ESG assistance is included in the Appendix F.

**2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**

ESG staff are required to take part in and act in accordance with the Continuum of Care (CoC) Coordinated Entry process, this includes using CoC's standard assessment tools and

practices. CoC is a community-based homeless assistance planning network whose accountabilities include effective use of mainstream programs. CoC and ESG coordinate and integrate to the extent possible, all assistance programs available to the homeless. Prioritization for Homeless Prevention and Rapid Re-housing assistance comply with CoC standards.

All applicants are assessed to determine eligibility based on homeless definitions, eligibility and assessments. ESG establishes documented intake procedures with Alaska Homeless Management Information System data collection and recordkeeping.

**3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations) will be allocated.**

The Municipality awards an annual grant to Catholic Social Services to expend monies for the Rapid Re-Housing Program. Homeless Prevention funds will be administered by the Aging and Disability Resource Center at the Municipality Anchorage Health Department.

The Municipality works in partnership with Chugach Electric Association (CEA) and Anchorage Water and Wastewater Utility (AWWU) to provide utility assistance to their members. In 2019, AWWU provided utility assistance \$8,109.52 to 22 AWWU households through their “Coins Can Count” program and CEA provided \$62,329 to 210 Chugach Electric households.

**4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.**

The Municipality Anchorage Health Department (AHD) has a dedicated member of the Anchorage Coalition to End Homelessness (Continuum of Care) board of directors.

The Municipality initiates a Cold Weather Plan for Homeless Persons (The Plan) as authorized by Anchorage Municipal Code Title 16, Chapter 16.120 Cold Weather Plan for Homeless Persons (AMC 16.120 as amended).

The plan enables Bean’s Café to temporarily shelter clients of Brother Francis Shelter to act as a temporary overnight cold weather shelter for homeless persons. Anchorage Churches designated by the Director of the AHD or their designee, will act as temporary overnight shelters for families and sober individuals when “The Plan” is in effect when outside temperature is 45 degrees Fahrenheit or below, by ambient or wind chill measures.

Enable social services facilities as designated by the Director of the Anchorage Health Department or their designee, to act as temporary overnight cold weather shelters for homeless persons when “The Plan” is in effect.

The objective of the “The Plan” is to safeguard the lives of vulnerable homeless individuals by providing temporary shelter during inclement weather conditions that pose a threat to those living without adequate shelter, especially those at higher risk of death due to exposure.

## **5. Describe Performance Standards for Evaluating ESG**

Summarized Performance Standards:

ESG funds will be used to provide short and medium-term housing for homeless and at risk of homelessness individuals and families. ESG assistance reports client data through Alaska Homeless Management Information System (AKHMIS). To receive funding under the HEARTH Act the ESG program uses a coordinated entry system.

Updates and input from the ACEH will help determine if the services should be increased or decreased. This includes: (1) continued development and implementation of policies and procedures, (2) the maintenance of the ESG, (3) establishing processes for monitoring and evaluating project activities and compliance, and (4) development and facilitation of a community plan to end or reduce homelessness.

## Appendix A – Municipality of Anchorage (Municipality) Citizen Participation Plan

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The Municipality must develop and follow a Citizen Participation Plan to receive federal funds for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG) and National Housing Trust Fund Grant (HTF) programs. The Citizen Participation Plan (CPP) covers the five-year Consolidated Plan (Con Plan), the Assessment of Fair Housing (AFH) as part of the Con Plan, each subsequent Annual Action Plan (AP), each year's Consolidated Annual Performance and Evaluation Report (CAPER), and any amendments to the Plans.

### 1. Purpose

This Citizen Participation Plan sets forth the policies and procedures for citizen participation in Anchorage's Con Plan process. The Municipality is responsible for the citizen participation process.

This Citizen Participation Plan encourages citizens to participate in the Con Plan process from the beginning. It outlines the procedures for community approval of the Con Plan, for addressing concerns and complaints, and for making amendments to the plan after approval.

### 2. Opportunities

The Municipality urges citizens to voice their concerns and share their ideas concerning CDBG, HOME, ESG and HTF program funds. It welcomes comments and suggestions regarding the CPP, Con Plan, AFH, APs, and CAPERs.

To encourage citizen participation, the Municipality will undertake the following activities each year.

- Hold at least four public hearings at different times during the program year;
- Offer public comment periods for the draft versions of the Con Plan, AFH, APs, and CAPERs;
- Consult with various groups to review needs, strategies, actions, projects, and performance;
- As soon as practical after HUD makes AFH-related data available to the Municipality, the Municipality will make such information and any other supplemental information the Municipality plans to incorporate into the AFH available to the public, public agencies, and other interested parties (24 CFR 91.105(b)(1)(i));
- Distribute notice of availability of copies of the draft Con Plan, AFH, APs, and CAPERs to the Housing, Homeless and Neighborhood Development Commission, Anchorage Coalition to End Homelessness (Continuum of Care), Federation of Community Councils, Alaska Housing Finance Corporation, other public and private

agencies that provide assisted housing, health services, and social and fair housing services, Municipal residents, and other groups as appropriate and upon request; and

- Provide the public with notice of citizen participation opportunities through email distribution lists kept for this purpose, and announcement of public hearing dates through newspaper publication a minimum of one week before date of public hearing. Related information will be posted on the Municipal website.

### **3. Public Hearings and Meetings**

The Municipality will hold at least two public hearings per year to obtain public comments on needs, strategies, actions, projects, and performance. If a need exists and resources permit, the Municipality will include other public meetings in addition to the hearings. The Municipality will hold public hearings and provide opportunities for public comment. To encourage the participation of public housing residents, the Municipality will try to hold one public meeting in a public housing community or in a place convenient to one or more public housing communities.

The Municipality will hold hearings covered by this Citizen Participation Plan at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities (24 CFR 91.105(f)). The Municipal Assembly may hold additional public hearings to approve plans and substantial amendments, appropriate grants, and allocate and award grant funds.

When the Municipality is concerned about significant public health risks that may result from holding in-person public hearings, the Municipality may undertake a virtual public hearing (alone, or in concert with an in-person hearing) and allow questions in real time, with answers coming directly from the Municipality to all “attendees”. As with an in-person hearing, the Municipality will provide accessibility for persons with disabilities and Limited English Proficiency to participate.

The ESG-CV funds require no consultation and citizen participation; however, the Municipality will publish how the allocation has or will be used on the appropriate Municipal web page. The Municipality will publish the ESG-CV allocations on the Anchorage Health Department, Community and Safety Development web page before funds are awarded. The CDBG-CV required public comment period is reduced to not less than 5 days and the public hearing may be virtual.

#### **Public Hearing #1—Proposed Needs, Strategies, and Projects**

The Municipality will hold the first public hearing each year to obtain citizens’ views and to respond to proposals and questions. It will be held before the 30-day public comment period begins for the Con Plan, AFH and an AP (24 CFR 91.105(e)(iii)). The public hearing will contain a discussion of the following items:

- The amount of assistance the Municipality expects to receive in the coming program year for the CDBG, HOME, ESG and HTF programs, including Program Income.



- The range of activities that the Municipality may undertake, including the estimated amount that will benefit low- and moderate-income persons.
- Address the proposed strategies and actions for affirmatively furthering fair housing consistent with AFH.
- The priority needs in the Con Plan.
- The five-year strategies in the Con Plan designed to address those needs.
- A discussion of the programs and activities necessary in the upcoming program year to carry out those strategies.

### **Public Hearing #2—Annual Action Plan or 5-Year Con Plan**

The Municipality will hold the second public hearing each year to obtain citizens’ views and comments on the draft AP or five-year Con Plan. This public hearing will be held during the 30 day public comment period.

### **Public Hearing #3— Annual Action Plan or 5-Year Con Plan**

The third public hearing of each year will be conducted at the Municipal Assembly during the official approval of the AP or five-year Con Plan; this meeting occurs after the 30-day comment period on the draft has ended.

### **Public Hearing #4— Consolidated Annual Performance and Evaluation Report (CAPER)**

The Municipality will hold the fourth public hearing no later than one week before the CAPER is due to HUD.

## **4. Public Comment Period**

To provide Anchorage’s residents with maximum feasible input into the Con Plan, AFH, APs and CAPERs, the Municipality provides the following public comment periods:

- Citizens may comment on the draft Con Plan, AFH, APs and substantial amendments for 30 days from the publication date.
- Citizens may comment on draft CAPERs for 15 days from the publication date.

To make comments on these documents, citizens may send written comments to the address under “Contact Information”; send an email to email address under “Contact Information”; or attend the public meetings and hearings described above. The participation of all citizens is encouraged and reasonable accommodation will be made for those persons with disabilities who need auxiliary aids, services, or special modifications and non-English speaking persons.

The Municipality will include a summary of citizen comments regarding each document and a summary of any comments not accepted (and the reasons why particular comments were not accepted). Public comments are any oral or written testimony provided at any public hearings, or any written testimony provided during the citizen comment period.

## **5. Consultation Activities**

The Municipality will consult with other groups as appropriate, including but not limited to the Anchorage Coalition to End Homelessness (the Continuum of Care), Federation of Community Councils, community councils, and social service agencies. For the AFH, the Municipality will consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, organizations that represent protected class members and organizations that enforce fair housing laws (24 CFR 91.100(a)(1). Additionally, the Municipality will consult with the Alaska Housing Finance Corporation regarding public housing agency needs, comprehensive grant program activities, neighborhood improvement programs, and resident programs and services (24 CFR 91.100(c)(1).

These groups may provide comments on the draft Con Plan, AFH and APs, including needs and proposed strategies, actions, projects, and substantial amendments.

## **6. Distribution of Draft Documents**

The Municipality will make the Con Plan, AFH, APs and CAPER available in both print and electronic versions as requested. Draft plans and reports will be posted on the Municipality website. The Municipality will also make these documents available in a format accessible to persons with disabilities or non-English speaking persons upon request.

## **7. Notification of Public Participation Opportunities**

The Municipality will provide citizens with reasonable opportunities for comment on the Con Plan, AFH, APs and CAPERs. The Municipality will place a public notice concerning the availability of these documents in one newspaper of general circulation. Citizens may send a request to Community Safety and Development to be added to the email distribution list.

The Municipality may also provide notice in a variety of additional ways that include the following:

- Notice may also be sent out by email;
- Electronic notification via facsimile;
- Direct mailing;
- Posting of notices on bulletin boards, public counters, and flyers in public agencies and community facilities; and
- Posting on the Municipality's website.

## **8. Amendments to the Consolidated Plan and Annual Action Plans**

Con Plan regulations (24 CFR 91.505) indicate that the Anchorage Housing and Community Development Plan (including the Con Plan, AFH and APs) may be changed in two ways after it is adopted by the Municipality and approved by HUD. The process used depends upon whether the change will be a non-substantive, or a substantial amendment.

The Municipality must amend its approved Con Plan, AFH or APs before it may make any of the following changes.

- A change in the allocation priorities or a change in the method of distributing funds.
- The addition of a new activity, using CDBG, HOME, ESG and HTF funds (including Program Income), not previously described in an AP.
- A change in the purpose, scope, location, or beneficiaries of an activity previously approved in an AP.
- The material change(s) in circumstances in Anchorage that affects the information on which the AFH is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances (24 CFR 91.105(c)(ii)) and (24 CFR 5.164).

The Municipality will make the amendment public and will notify HUD about the amendment. The Municipality will ensure that all amendments are contained in the CAPER submitted to HUD after the end of the program year. The Municipality reserves the right to make non-substantive changes to the Con Plan, AFH or an AP without opening a public comment period.

#### **Non-Substantial Amendments**

A non-substantial amendment includes any changes to an AFH or AP not considered a substantial amendment.

#### **Substantial Amendments**

Con Plan, AFH and AP regulations consider certain amendments to be substantial amendments that require a public comment period and additional citizen participation. A substantial amendment would be triggered by any of the following activities.

- Changes in the use of CDBG funds from one HUD, CDBG eligible activity to another (24 CFR 91.05(c)(1)). Budget increases or decreases, by themselves, do not constitute a substantial amendment.
- Any new project not previously included in the Con Plan or an AP.
- A change in project location if the project moves outside of previously identified geographical boundaries or results in a different service area.
- The target population benefiting from an activity or project changes from the previously identified target population.
- An increase or reduction in the amount budgeted for a project or activity by more than 50% of the original budget or by more than \$100,000, whichever is greater.
- The material change(s) in circumstances in Anchorage that affects the information on which the AFH is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances (24 CFR 91.105(c)(ii)) and (24 CFR 5.164).

## **Public Participation and Approval Process for Substantial Amendments**

If the Municipality should need to make a substantial amendment to its approved Con Plan, AFH or AP, it will follow the public participation and approval process below, which is substantially like that for an AP.

### **Notification of Substantial Amendment**

The Municipality will notify the community of any proposed substantial amendment that is available for comment. Notification will be provided, at a minimum, by placing a public notice in one newspaper of general circulation and by distributing the notice to interested parties through Community Safety and Development's email distribution list. Interested parties may be added to the email distribution list by sending an email request to Community Safety and Development.

### **Public Comment Period of Substantial Amendment**

The public will be invited to comment on the proposed substantial amendment for a minimum of 30 days. During the public comment period, the Municipality will hold at least one public hearing to allow the public to make comments in person. Comments will also be accepted in writing during the public comment period.

### **Consultations**

Depending on the nature of the amendment, the public participation process may also include consultation with other organizations.

### **Comments Considered**

The Municipality will consider any comments received in writing or at the public hearing. It will make any appropriate changes to the amendment in response to the comments and consultation(s) and attach a summary of these comments along with a summary of the Municipality's response to them, to the substantial amendment.

### **Final Approval**

The substantial amendment will be submitted to the Municipal Assembly for approval.

## **9. Obtaining Citizen Comments**

The Municipality will summarize oral comments from public hearings and any written comments it receives concerning the Con Plan, AFH, APs or CAPER. The Municipality will consider all comments received during the public comment period, make any appropriate changes to the subject document in response to the comments, and attach a summary of the comments, along with a summary of the Municipality's response to them, to the document. Members of the public may obtain copies of the full version of written or public hearing comments by contacting Community Safety and Development.

## **10. Outreach to Persons with Disabilities and Non-English-Speaking People**

To provide full access to programs under the Con Plan, AFH, APs or CAPERs for non-English speaking persons (24 CFR 91.105(a)(4)), the Municipality may undertake the following actions:

- Communicate with organizations serving various ethnic groups to insure adequate involvement with this community;
- Disseminate program materials and public hearing notices to nonprofit organizations serving the Municipality's culturally diverse population;
- Publish notices of public hearings, information availability, and citizen meetings for the proposed Con Plan and any substantial amendments in non-English publications available within the Anchorage community; and
- Provide interpreters (if available) at public hearings when the Municipality expects a significant number of non-English speaking residents to attend, or upon request.

To provide full access to programs under the Con Plan, AFH, APs or CAPERs for persons with disabilities, the Municipality will undertake one or more of the following actions:

- Select only sites for public hearings that are accessible for persons with physical disabilities;
- Provide a verbal summary or recorded summary of the Con Plan to persons with visual impairments;
- Provide sign-language interpreters or written translation at public hearings when the Municipality expects a significant number of people with hearing loss to attend, or upon request; and
- Conduct outreach to community organizations that represent persons with disabilities as part of the Con Plan process.

Non-English-speaking residents, persons with a hearing impairment, sight-impaired and blind individuals, and other persons with physical disabilities and special needs may call, write, fax, in person, or send an email to Community Safety and Development; PO Box 196650, Anchorage, AK 99519-6650 (mail); (907) 343-4881 (telephone); (907) 343-4107 (fax); [Valerie.Madison@anchorageak.gov](mailto:Valerie.Madison@anchorageak.gov) (email); or (907) 343-4468 (TTY/TDD).

#### **11. Public Information and Access to Records**

Citizens, public agencies, and other interested parties may review information and records relating to the Con Plan. The Municipality will provide public access to information about the HUD programs under its Con Plan, including the following documents that the Municipality maintains on file.

- Federal Laws: Summary of the Housing and Community Development Act of 1977; Title I of the Housing and Community Development Act of 1974, as amended: The National Affordable Housing Act (as amended)

- Federal Regulations: CDBG, HOME, ESG and HTF Program regulations; related issuances and provisions (i.e. Uniform Relocation Assistance)
- Con Plan, Assessment of Fair Housing, APs and Consolidated Annual Performance and Evaluation Reports
- Information about the Municipality’s CDBG, HOME, ESG and HTF programs
- Anchorage’s Citizen Participation Plan for 2018–2022
- The Municipality’s HUD information: grant agreements, audit records, evaluation reports, approval letters, and related correspondence
- The Municipality’s public meeting records: public meetings, informal meetings with civic and neighborhood groups, and related notifications pertaining to programs under the Con Plan

Individuals may access many of these documents at no cost by the Internet at the Municipality’s website

<http://www.muni.org/Departments/health/PHIP/CSD/Pages/Default.aspx>, at Community Safety and Development’s office, Municipal libraries, or by contacting Community Safety and Development staff. Many federal documents may be accessed at [www.hudclips.org](http://www.hudclips.org).

To locate records and arrange space for viewing, the Municipality requests written notice a minimum of 2 days before review. Review of records that are at least 2 years old will require a 5-day notice. Requests for multiple copies of the same documents may be subject to a per page copying charge that will not exceed the copying charge to the Municipality.

## **12. Technical Assistance**

Upon request, the Municipality may provide technical assistance to neighborhood groups, nonprofit organizations, and other organizations representative of low- and moderate-income people who wish to develop proposals for funding assistance under any programs covered by the Con Plan. The Municipality will determine the level and type of technical assistance on a case-by-case basis.

Additionally, Municipal staff will work with organizations funded under an AP to ensure that funds are being spent for their intended purpose and within the rules and regulations of the federal government.

## **13. Complaints**

Municipal Code Title 7 – Purchasing and Contracts and Professional Services governs the submission of complaints regarding the competitive award of funding. Residents should file such complaints with the Municipal Purchasing Department according to procedures described in procurement documents.

Citizens should submit all other complaints to the Municipality, which will provide a substantive written response to every written citizen complaint related to the Citizen Participation Plan, the Con Plan, AFH, APs, substantial amendments to APs and CAPERs

within 15 working days (24 CFR 91.105(j)). Send formal complaints to address under “Contact Information”.

#### Complaints

Municipality of Anchorage  
Anchorage Health Department  
Human Services Division  
Community Safety and Development  
P.O. Box 196650  
Anchorage, Alaska 99519–6650

Such substantive complaints must address the following issues (specified in HUD regulations).

- The Municipality’s description of needs and objectives in its Con Plan is plainly inconsistent with available facts and data.
- The Municipality’s proposed activities are plainly inappropriate in meeting the needs and objectives identified by the Municipality.
- The Municipality’s application does not comply with HUD requirements regulating programs under the Con Plan or other applicable laws.
- The Municipality’s application proposes activities that are otherwise ineligible as specified in applicable HUD regulations.

The Municipality will attach a summary of citizen comments and complaints and a summary of any comments not accepted (and the reasons why the Municipality did not accept them) to the final Con Plan, AFH, APs, CAPERs, or substantial amendment.

#### **Contact Information**

Municipality of Anchorage  
Anchorage Health Department  
Human Services Division  
Community Safety and Development (CSD)  
825 L Street, Room 506  
Anchorage, AK 99501  
Mail: P.O. Box 196650  
Anchorage, Alaska 99519-6650  
Phone: 907-343-4822  
FAX: 907- 249-7858  
E-mail: [Valerie.Madison@anchorageak.gov](mailto:Valerie.Madison@anchorageak.gov)





## **Appendix B – Public Comment**

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## **Appendix C – Assembly Resolution 2022-XXX**

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## Appendix D – Certifications

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## Appendix E – SF-424s

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## **Appendix F – Written Standards for Providing ESG Assistance**

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Municipality of Anchorage



### **ESG POLICIES AND PROCEDURES**

Policies and Procedures for the MOA/AHD ESG and ESG-CV Funding

Final 8.9.2021

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## Municipality of Anchorage, Emergency Solutions Grant

### Policies and Procedures Guide

#### Program Purpose

CFDA Number: 14.231

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Home Assistance Act, revising the Emergency Shelter Grants (ESG) Program in many ways and renaming it the Emergency Solutions Grants program that was authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C 11371-11378).

This guide is largely a consolidation of standards for ESG set by HUD and other entities as applicable. While the guide is designed to be a convenient reference and not an exhaustive review of all regulations and guidance associated with the ESG program. Grantees and recipients are to familiarize themselves with federal requirements and any other applicable guidance associated with ESG. It is incumbent upon the grantee to understand ESG program requirements.

#### FAIR HOUSING AND EQUAL OPPORTUNITY

The requirements in 24 CFR part 5, subpart A are applicable, including the nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a). Section 3 of the Housing and Urban Development Act of 1968, 12 U.S.C. 1701u, and implementing regulations at 24 CFR part 135 apply, except that homeless individuals have priority over other Section 3 residents in accordance with § 576.405(c).

The grantee and recipients must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. If it is unlikely that the procedures the sub-grantee intends to use to make known the availability of the facilities, assistance, and services will reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, the grantee must establish additional procedures that ensure that those persons are made aware of the facilities, assistance, and services. The recipient must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities.

#### LANGUAGE ACCESS PLAN

Consistent with Title VI and Executive Order 13166, grantees and recipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English

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proficiency (LEP) persons. An individual's ability to speak, read, write or understand English cannot impede his or her access to programs or activities. The grantees and recipients must assess the need for language assistance within its service area by conducting a Four Factor Analysis to understand the languages spoken by LEP persons and how to provide needed language assistance.

Further, the grantee and subrecipients must maintain documents regarding its efforts to comply with LEP requirements, including tracking LEP services provided to eligible persons, provide evidence of compliance with its locally adopted LEP to HUD upon request, review and update its Four Factor Analysis at least every five years, and resolve any findings related to its LEP obligations by taking corrective action. Repeated violations may require other appropriate enforcement mechanisms up to and including referral to HUD or repayment of awarded funds.

Further, the grantee and recipient must maintain documents regarding its efforts to comply with LEP requirements, including tracking LEP services provided to eligible persons and providing evidence of compliance.

#### ACCESS TO HOUSING FINAL RULE

On February 3, 2012, HUD published a final rule titled "Equal Access to Housing and HUD Programs Regardless of Sexual Orientation or Gender Identity." This rule, known as the "Equal Access Rule," became effective on March 5, 2012. The Equal Access Rule applies to all McKinney-Vento funded housing programs, including ESG. It creates a new regulatory provision that generally prohibits considering a person's marital status, sexual orientation, or gender identity in making eligibility determinations for housing.

In July 2014, HUD published FAQ ID 1529, which addresses the applicability of the term *family* in the Equal Access Rule. The FAQ defines *family* as applicable to the ESG program as follows:

*Family* includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are a family and must be served together as such. Further, a recipient or subrecipient receiving funds under the ESG or CoC Programs cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity.

## EQUAL ACCESS IN ACCORDANCE WITH GENDER IDENTITY

On September 21, 2016, HUD published a final rule in the Federal Register entitled "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs." Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD). This rule builds upon HUD's February 2012 final rule entitled "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity" (2012 Equal Access Rule), which aimed to ensure that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. The final rule requires that recipients and subrecipients of CPD funding, as well as owners, operators, and managers of shelters, and other buildings and facilities and providers of services funded in whole or in part by any CPD program, to grant equal access to such facilities, and other buildings and facilities, benefits, accommodations and services to individuals in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family.

All MOA ESG grantees and recipients must comply with requirements of the Equal Access to Housing Final Rule, the Equal Access in Accordance with Gender Identity Final Rule, and any applicable guidance, regardless of whether the ESG sub-grantee is a victim service or faith-based provider. Non-compliance may result in termination of ESG funding. The regulation and guidance cited above, as well as further guidance from HUD, may be accessed at the following websites. All ESG recipients are expected to review this material in its entirety.

Equal Access to Housing and Equal Access in Accordance with Gender Identity Final Rules can be found at: <https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/>

FAQ 1529,  
<https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/>

## Violence Against Women Act COMPLIANCE

The grantee and subrecipient is required to comply with the Violence Against Women Act (VAWA) Reauthorization of 2013 to include the prohibition against denial or termination of assistance based on the fact the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, per 24 CFR part 5, subpart L and 576.409. If the grantee determines eligibility for or administers rental assistance, the grantee is also expected to satisfy additional VAWA regulatory requirements to include, but not limited to, providing a notification and certification to recipients of rental assistance at specified times, adopting an emergency transfer plan applicable to its program, and protecting confidentiality of victims pursuant to the requirements in 24 CFR part 5, subpart L and 576.409.

#### EMERGENCY TRANSFER PLAN

Part of the regulations requires that each ESG grantee and recipient who provides rental assistance adopt an Emergency Transfer Plan no later than June 14, 2017 based on HUD's model Emergency Transfer Plan. The Emergency Transfer Plan will allow eligible tenants to request and make an internal transfer when a safe unit is immediately available and receive assistance regarding external transfers.

Specifically, the Emergency Transfer Plan must:

- Define participants eligible for an emergency transfer;
- List documentation needed to request an emergency transfer;
- Outline confidentiality protections; and
- Describe how an emergency transfer may occur.

Although HUD's model Plan contains the specific elements that must be adopted by all grantees and recipients, they also have discretion as to other elements that should be included in their plans. HUD has encouraged all grantees and recipients to include as much specific information applicable to the transfer as possible and reflect the unique requirements or features of their programs. Note that in addition to the minimum requirements listed above, agencies must include language in their Plans as required by their program specific regulations. See 576.409 and 574.604.

The HUD model Emergency Transfer Plan, and other model documents, can be found at the following website: [https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/housing/mfh](https://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh)

#### NOTICE AND CERTIFICATION TO TENANTS

VAWA compliance also requires agencies to provide two HUD forms entitled "Notice of Occupancy Rights under the Violence Against Women Act" and "Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking" (both attached) to applicants and tenants at each of the following times:

- (i) At the time the applicant is denied assistance or admission under a covered housing program;
- (ii) Where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records should be documented. Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address;
- (iii) With any notification of eviction or notification of termination of assistance; and

- (iv) During the annual recertification or lease renewal process, whichever is applicable, or if there will be no recertification or lease renewal for a tenant during the 12 months following December 16, 2016, then through other means.

#### Other Requirements

VAWA includes requirements in addition to those listed above with which sub-grantees must familiarize themselves and comply. Further information can be found at the following website: <https://www.hudexchange.info/resource/4718/federal-register-notice-proposed-rule-violence-against-women-act-2013-vawa-2013/>

#### FAITH BASED ACTIVITIES

Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive ESG funds. Neither the Federal Government nor a State or local government receiving funds under ESG shall discriminate against an organization based on the organization's religious character or affiliation.

Organizations that are directly funded under the ESG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for program participants.

Any religious organization that receives ESG funds retains its independence from Federal, State, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use direct ESG funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities to provide ESG-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, an ESG-funded religious organization retains its authority over its internal governance, and the organization may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.

An organization that receives ESG funds shall not, in providing ESG assistance, discriminate against a program participant or prospective program participant based on religion or religious belief.

ESG funds may not be used for the rehabilitation of structures to the extent that those structures are used for inherently religious activities. ESG funds may be used for the rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under the ESG program. Where a structure is used for both eligible and inherently religious activities, ESG funds



may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds.

Sanctuaries, chapels, or other rooms that an ESG-funded religious congregation uses as its principal place of worship, however, are ineligible for funded improvements under the program. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition (see 24 CFR parts 84 and 85).

If the recipient or a grantee that is a local government voluntarily contributes its own funds to supplement federally funded activities, the recipient or grantee has the option to segregate the Federal funds or commingle them. However, if the funds are commingled, this section applies to all the commingled funds.

#### COORDINATED ENTRY

All ESG sub-grantees located in the Municipality of Anchorage Continuum of Care (COC) must use the coordinated assessment system developed by the COC, Anchorage Coalition to End Homelessness (ACEH). This system will include all homeless subpopulations and involve the use of a standardized assessment tool that will result in referrals to those seeking assistance based upon a uniform decision-making process. The system will ensure that those with the greatest needs receive priority for housing and service provision and that no unnecessary barriers exist for individuals to receive assistance. ESG sub-grantees located in a CoC other than the Municipality of Anchorage must use the coordinated assessment system developed by the CoC(s) in which they are located.

Additionally, all data will be entered into the approved AKHMIS data and only reports generated through this system will be accepted by AHD for reporting.

#### **Area-wide system coordination requirements as per 24 CFR 576.400:**

The consolidation and codification of the CoC planning processes are intended to increase efficiency and effectiveness in providing housing and services to those experiencing homelessness. The recipient is to consult with ACEH in determining how to allocate ESG funds each program year as per 24 CFR 576.400.

Each recipient must consult with each Continuum of Care, ACEH, in determining how to allocate ESG funds each program year; developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and developing funding, policies, and procedures for the administration and operation of the HMIS.

The recipient and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area.

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Each year, HUD awards funding competitively to eligible project applicants which can be States, units of general-purpose, local governments and nonprofit organizations collectively known as recipients. Recipients may contract or subgrant with government entities or with other organizations.

Recipients must consult with the Continuums of Care (CoC) operating within the jurisdiction in determining how to allocate ESG funds. All ESG recipients are required to coordinate with each other and to comply with additional requirements established by the HEARTH ACT.

The CoC programs are designed to assist sheltered and unsheltered homeless people by providing housing or services needed to help individuals move into rapid re-housing or permanent housing, with the goal of long-term stability.

The CoC, ACEH, is responsible for:

- Designing and tooling the local application for HUD CoC Program funds
- CoC planning ranks funding priorities and local needs
- Operating the CoC that includes coordinating the implementation of a housing and service system for those experiencing homelessness within its geographic area
- Operating and designating a Homeless Management Information Operating System (HMIS)
- Coordinating other funding streams and resources to targeted homeless programs

In the Municipality of Anchorage an Interagency Council on Homelessness is coordinated by the COC.

ESG grantees and recipients must match grant funds with an equal amount of cash and/or noncash contributions, dollar for dollar.

Recipients must establish and consistently apply or require that subrecipients establish and consistently apply written standards to each funding component of ESG assistance.

ESG is intended to prevent persons who are housed from becoming homeless by helping them regain stability in their current housing or permanent housing. Eligible consumers must be at imminent risk of homelessness, homeless under other federal statutes; fleeing/attempting to flee domestic violence or meet the criteria for being at risk of homelessness and have an income at or below 30% of median income. Eligible consumers must lack the resources or support networks to help them retain or obtain appropriate, stable housing. Eligibility determination and prioritization must comply with HUD Program Standards.

#### **HOUSING FIRST APPROACH**

The MOA ESG program prioritizes projects with a low-barriers approach to homeless services and a focus on permanent housing placement as quickly as possible. This is also known as the Housing First approach. Projects committed to the Housing First approach must ensure that they do not screen out any individuals or families for assistance based upon perceived barriers to housing or services. Examples of perceived barriers include, but are not limited to, the following:

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- Having too little or no income;
- Current or past substance abuse;
- Having a criminal record (except for state mandated restrictions);
- Having a history of domestic violence.

In addition, assistance may not be terminated to any recipients based upon these barriers. Examples of this include:

- Failure to participate in supportive services and case management activities;
- Failure to make progress on a services plan;
- Loss of income or failure to improve income;
- Being a victim of domestic violence.

#### ESG WRITTEN STANDARDS

Pursuant to the HEARTH ESG Interim Rule, all ESG recipients are required to develop certain policies and procedures for recipients to use when providing ESG assistance. Following a collaborative development process with the Continuum of Care (CoC), the ESG Entitlement, AHD, has adopted this policy and procedure manual as the Written Standards. These standards are applicable to all sub-grantees awarded ESG funding.

#### ELIGIBLE ACTIVITIES (PROJECT TYPES)

All recipients of MOA ESG funds are required to comply with all ESG requirements, including the provision of case management, helping program participants increase income, either via employment assistance or through the acquisition of mainstream benefits, and helping program participants move into and remain in permanent housing. MOA reserves the right to update requirements for all projects at its discretion.

#### The ESG program provides funding to:

1. Engage homeless individuals and families living on the street;
2. Improve the number and quality of emergency shelters for homeless individuals and families;
3. Help operate these shelters;
4. Provide essential services to shelter residents;
5. Rapidly re-house homeless individuals and families;
6. Prevent families and individuals from becoming homeless; and
7. Operate and staff for the AKHMIS Data System operated by the COCESG funds may be used for five program components: street outreach, emergency shelter, homelessness

prevention, rapid re-housing assistance, and HMIS. Administrative costs are reserved for AHD to administer the ESG Grant funding.

**ESG General Provisions and expenditure limits of 24 CFR 576.100:**

- a) ESG funds may be used for the five components as set forth in 24 CFR 576.101 through 24 CFR 576.107 as well as administrative activities as set forth in 24 CFR 576.108.
- b) There are funding limitations on Street Outreach and Emergency Shelter activities, the recipient award amount cannot exceed the greater 60% of the recipient's fiscal year or the amount of Fiscal Year 2010 grant funds committed for homeless assistance activities.
- c) The total amount of ESG funds that may be used for administrative activities cannot exceed 7.5% of the recipient's fiscal year grant.
- d) Subject to cost principles in 2 CFR 200, subpart E, and other requirements in this part, employee compensation and other overhead costs directly related to carrying out eligible costs of the program components. These costs are not subject to the expenditure limit in paragraph c. in this section.

**ELIGIBLE ESG PROGRAM COMPONENTS**

**Street Outreach**

Essential Services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, transportation, and services for special populations.

The term "unsheltered homeless people" is defined as follows by 24 CFR § 576.2(1)(i) –

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

There are 6 eligible activities for street outreach, defined by 24 CFR § 576.101 as follows:

**1) Engagement**

The location, identification and relationship building with unsheltered homeless people and the engagement of them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. Eligible activities include assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

2) Case management

The assessment of housing and service needs and implementing individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under § 576.400(d); conducting the initial evaluation required under § 576.401(a); including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

3) Emergency health services

Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living. Eligible treatment consists of developing a treatment plan; assisting program participants to understand their health needs; providing directly or obtaining emergency medical treatment; and providing medication and follow-up services.

4) Emergency mental health services

Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living. Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation of the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

5) Transportation

The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible.

6) Services for special populations

ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(5) of this section.

Outreach programs should consider the use of an assessment form that is suited to a street assessment. This should include the options of diversion and placements directly into permanent housing.

24 CFR 576.101.

### Emergency Shelter

Shelter Operations, including maintenance, rent, repair, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

Based on the HEARTH ESG Interim Rule located at 24 CFR § 576, "emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements." Funded emergency shelter projects should have low barriers to entry and participation. Shelter stays should be avoided if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. Emergency shelter projects should be closely linked to an array of services in order to accomplish the goal of stable permanent housing. Linked services may include, but are not limited to, rapid re-housing, transitional housing, affordable housing placement, and employment. Linkages should also be made to applicable mainstream programs such as SOAR, food stamps (SNAP), TANF, etc.

Subject to explicit approval, ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, and costs of operating emergency shelters. Eligible cost items, based on 24 CFR § 576, are described as follows.

#### 1) Case management

The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

- (A) Using the centralized or coordinated assessment system as required under § 576.400(d);
- (B) Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility;
- (C) Counseling;
- (D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
- (E) Monitoring and evaluating program participant progress;
- (F) Providing information and referrals to other providers;
- (G) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (H) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

#### 2) Childcare

The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the

age of 18. The child-care center must be licensed by the jurisdiction in which it operates for its costs to be eligible.

### 3) Education services

When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

### 4) Employment assistance and job training

The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. Learning skills include those skills that can be used to secure and retain a job. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching and referrals to community resources.

### 5) Outpatient health services

Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

### 6) Legal services

(A) Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

(B) Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

(C) Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, stalking, and appeal of veterans and public benefit claim denials.

(D) Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

(E) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the

grantee is a legal services provider and performs the services itself, the eligible costs are the grantee's employees' salaries and other costs necessary to perform the services.

(F) Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

#### 7) Life skills training

The costs of teaching critical life management skills that may never have been learned or have been lost during physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

#### 8) Mental health services

(A) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.

(B) ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

(C) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

(D) Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

#### 9) Substance abuse treatment services

(A) Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. (B) ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

(C) Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

#### 10) Transportation

Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities. These costs include the following:

(A) The cost of a program participant's travel on public transportation;

(B) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(C) The cost of purchasing or leasing a vehicle for the recipient or grantee in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and (D) The travel costs of recipient or grantee staff to accompany or assist program participants to use public transportation.

#### 11) Shelter operations



Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

#### Family Separation and Emergency Shelter

HUD regulations state that all shelters serving families with children under 18 are prohibited from denying access to families based on the age of a child under 18. This requirement has been issued through the HEARTH Act and the ESG Interim Rule. All DCA funded emergency shelters and transitional housing facilities will comply with this requirement. Non-compliance may result in removal of ESG funds.

#### ESG Definition of Essential Services

- Case Management, the cost of assessing, arranging, coordinating and monitoring the delivery of individual services; use of centralized or coordinated assessment system under 24 CFR 576.400, the initial evaluation which includes verifying and documenting eligibility; counseling; developing and securing coordinated services and obtaining Federal, State and local benefits; monitoring and evaluating program participant's progress; providing information and referrals to other providers, providing an on-going risk assessment and safety plan with victims of domestic violence, sexual assault and stalking and; developing an individualized housing and service plan, including a path to permanent housing.
- Childcare, cost of childcare for program participants under the age of 13.
- Education services, cost of improving knowledge and basic education skills.
- Employment assistance and job training, cost of training and assistance programs.
- Outpatient health services, costs of outpatient treatment of medical conditions.
- Legal services, hourly fees advice for participant's ability to obtain and retain housing.
- Life Skills training, costs of critical life skills training necessary for a participant to function independently in the community.
- Mental Health Services, direct outpatient treatment by professionals.
- Substance Abuse Treatment Services, treatment services to prevent, reduce or eliminate addictive behaviors.
- Transportation services is travel from medical, childcare, employment or other essential services facilities by participant or service workers.
- Service for special populations, services for homeless youth, people with HIV/AIDS and victim services.
- Shelter operations, the eligible costs of operations if rent, security, fuel, equipment, insurance, utilities, food, furnishings and supplies necessary for the operations of the emergency shelter.
- Renovation must be owned by a government entity or private nonprofit organization, these are eligible costs of labor, materials, tools and other costs of renovation. Minimum period of use 10 years.

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- Conversion of a building to an emergency shelter. Minimum period of use 10 years.
- Renovation other than major rehabilitation or conversion. Minimum period of use 3 years.
- Assistance required under the Uniform Relocation Assistance (URA) and Real Property Acquisition Act of 1970, for persons displaced by a project assisted with ESG funds.
- Prohibition against involuntary family separation, child under the age of 18 must not be basis for denying admission to an emergency shelter that uses ESG funds and provides shelter to families under age 18.
- Minimum period of use of renovated buildings, is to maintain it as a shelter for homeless individuals and families for not less than a period of 3 or 10 years depending on the type of renovation and the value of the building.
- Essential services and shelter operations.
- Maintenance of effort for essential services related to street outreach and services related to emergency shelter.

Renovation, including major rehabilitation or conversion of a building to serve as an emergency shelter. The emergency shelter must be owned by a government entity or private nonprofit organization. The shelter must serve homeless persons for at least 3 or 10 years, depending on the type of renovation and the value of the building. Note: Property acquisition and new construction are ineligible ESG activities.

24 CFR 576.102.

#### Homelessness Prevention

Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in the ESG homeless definition.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

Prevention is most efficiently implemented when targeted to those at greatest risk of losing housing. Households receiving this funding must have an income level at or below 30% Area Median Income (AMI) and must demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under Category 1 of the homeless definition. Enrollment in a prevention program should typically last around 2-6 months, although enrollments may be longer based on circumstances. Enrollment must rely heavily on a case management plan to ensure long term stability for program participants. Grantees and recipients should negotiate with landlords as the first step in resolving eviction crises. Prevention implementations should effectively target households at greatest risk of homelessness and assist participants to increase household incomes during enrollment. Linkages should also be made to applicable mainstream programs such as SOAR, food stamps (SNAP), TANF, etc.

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Eligible costs include:

- Rental Assistance: rental assistance and rental arrears;
- Financial assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs; and
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair.

24 CFR 576.103.

#### **Rapid Re-Housing**

Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

The primary goal is to stabilize a program participant in permanent housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. Households receiving ESG rapid re-housing assistance must have an income level at or below 30% AMI. Enrollment in a rapid re-housing project must rely heavily on a case management plan to ensure long term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants. Linkages should also be made to applicable mainstream programs such as SOAR, food stamps (SNAP), TANF, etc.

Eligible costs include:

- Rental Assistance: rental assistance and rental arrears,
- Financial Assistance: rental application fees, security and utility deposits, utility payments,
- last month's rent, moving costs, Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair.

24 CFR 576.104

Documentation that applicants meet income eligibility guidelines is required for rapid re-housing and prevention. Total household income should include allowable sources from all household members.

The grantee and recipient must require each program participant receiving rapid re-housing or homelessness prevention assistance to notify them, regarding changes in the program participant's income or other circumstances (e.g., changes in household composition) that affect the program participant's eligibility for assistance under ESG. When notified of a relevant change, the grantee must re-evaluate the program participant's eligibility, the amount and types of assistance the program participant needs.

Re-Certification determines whether an individual or family is still eligible for a project and is required for all rapid re-housing and prevention projects. It occurs:

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- Every 90 days after the project enrollment date, AND
- Annually for those enrolled in the project one (1) year after the initial enrollment date.

Assistance beyond 90 days may not be issued until a 90-day re-certification is complete. Assistance beyond one year may not be issued until annual re-certification is complete.

#### **Data Collection (HMIS)**

ESG funds may be used to pay for the costs of participating in and contributing to the HMIS designated by the Continuum of Care, ACEH.

HMIS projects are used to supplement efforts made by ESG grantees and recipients to provide complete and accurate data in the HMIS, or comparable database for victim service providers. Eligible costs include software, data entry, limited assistance obtaining HMIS technical assistance and training, and user fees. AHD may limit HMIS awards to specific project types and/or geographic areas, which are subject to change in the application guidelines.

24 CFR 576.107

#### **DEFINITION OF HOMELESS, AT RISK OF HOMELESSNESS, AND CHRONIC HOMELESSNESS**

##### **Homeless Definition**

The HUD definition of Homeless from 24 CFR 576.2:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

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(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

For the purposes of this definition, other federal statutes for defining homelessness include:

- Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a)
- Section 637 of the Head Start Act (42 U.S.C. 9832)
- Section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2)
- Section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h))
- Section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012)
- Section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) OR
- Section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a)

#### At Risk of Homelessness Definition

The HUD Definition of "At-Risk of Homelessness" is:

(1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

#### Chronic Homelessness Definition

Chronically homeless is defined by HUD 24 CFR 91 and 24 CFR 578.103 and section 401(2) of the McKinney-Vento act.

McKinney-Vento section 401(2) definition of "Chronically Homeless":

An individual or family that is homeless and resides in a place not meant for human habitation, a safe haven, or in an emergency shelter, and has been homeless and residing in such a place for at least 1 year or on at least four separate occasions in the last 3 years. The statutory definition also requires that the individual or family has a head of household with a diagnosable substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability.

HUD 24 CFR 91 and 24 CFR 578.103 definition of "Chronically Homeless":

A "chronically homeless" individual is defined to mean a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the "chronically homeless" definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

## DOCUMENTATION AND RECORDKEEPING

### Housing Status Documentation

ESG grantees must establish and follow written intake procedures to ensure program compliance. The procedures must require documentation at intake of the evidence relied upon to establish and verify homelessness or at-risk of homelessness status. All recipients, grantees, and sub-recipients must follow the documentation requirements as outlined in 576.500(b) to verify and document homeless status of each participant.

### Additional Documentation

The following is not an exhaustive list of documentation that must be kept but is further explained 24 CFR 576.500

*Determinations of ineligibility.* For each individual and family determined ineligible to receive Emergency Solutions Grant (ESG) assistance, the record must include documentation of the reason for that determination.

(e) *Annual income.* For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:

(f) *Program participant records.* In addition to evidence of homeless status or "at risk of homelessness" status, as applicable, records must be kept for each program participant that document:

(g) *Centralized or coordinated assessment systems and procedures.* The recipient and its subrecipients must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.

(h) *Rental assistance agreements and payments.* The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

(i) *Utility allowance.* The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.

(j) *Shelter and housing standards.* The records must include documentation of compliance with the shelter and housing standards in §576.403, including inspection reports.

(k) *Emergency shelter facilities.* The recipient must keep records of the emergency shelters assisted under the ESG program, including the amount and type of assistance provided to each emergency shelter. As applicable, the recipient's records must also include documentation of the value of the building before the rehabilitation of an existing emergency shelter or after the conversion of a building into an emergency shelter and copies of the recorded deed or use restrictions.

(l) *Services and assistance provided.* The recipient must keep records of the types of essential services, rental assistance, and housing stabilization and relocation services provided under the recipient's program and the amounts spent on these services and assistance. The recipient and its subrecipients that are units of general purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.

(m) *Coordination with Continuum(s) of Care and other programs.* The recipient and its subrecipients must document their compliance with the requirements of §576.400 for consulting with the Continuum(s) of Care and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.

(n) *HMIS.* The recipient must keep records of their participation in HMIS or a comparable database by all projects of the recipient and its subrecipients.

(o) *Matching.* The recipient must keep records of the source and use of contributions made to satisfy the matching requirement in §576.201. The records must indicate the particular fiscal year



grant for which each matching contribution is counted. The records must show how the value placed on third-party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

(p) *Conflicts of interest.* The recipient and its subrecipients must keep records to show compliance with the organizational conflicts-of-interest requirements in §576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in §576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions.

(q) *Homeless participation.* The recipient must document its compliance with the homeless participation requirements under §576.405.

(r) *Faith-based activities.* The recipient and its subrecipients must document their compliance with the faith-based activities requirements under §576.406.

(s) *Other Federal requirements.* The recipient and its subrecipients must document their compliance with the Federal requirements in §576.407 and §576.409, as applicable, including:

(1) Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under §576.407(a) and the affirmative outreach requirements in §576.407(b), including:

(i) Data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds; and

(ii) Documentation that the recipient submitted a certification that it will affirmatively further fair housing, consistent with §§5.150 and 5.151 of this title.

(2) Records demonstrating compliance with the uniform administrative requirements in 2 CFR part 200.

(3) Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.

(4) Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.

(5) Data on emergency transfers requested under §576.409, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

(t) *Relocation.* The records must include documentation of compliance with the displacement, relocation, and acquisition requirements in §576.408.

(u) *Financial records.*

(1) The recipient must retain supporting documentation for all costs charged to the ESG grant.

(2) The recipient and its subrecipients must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under “§§576.101 through 576.109, financial management in 2 CFR 200.302, and the cost principles in 2 CFR part 200, subpart E.

(3) The recipient and its subrecipients must retain records of the receipt and use of program income.

(4) The recipient must keep documentation of compliance with the expenditure limits in §576.100 and the expenditure deadline in §576.203.

(v) *Subrecipients and contractors.*

(1) The recipient must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable. If the recipient is a State, the recipient must keep records of each recapture and distribution of recaptured funds under §576.501.

(2) The recipient and its subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 2 CFR part 200, subpart D.

(3) The recipient must ensure that its subrecipients comply with the recordkeeping requirements specified by the recipient and HUD notice or regulations.

(w) *Other records specified by HUD.* The recipient must keep other records specified by HUD.

(x) *Confidentiality.* The recipient and its subrecipients must develop and implement written procedures to ensure confidentiality.

### **THIRD PARTY SOURCE**

#### **DOCUMENTS ARE THE PREFERRED METHOD OF VERIFYING AND DOCUMENTING HOUSING STATUS.**

##### Preferred Order of Documentation

Pursuant to 24 CFR 576.500(b), the order of priority for evidence establishing and verifying homeless status is:

- 1) Third-party documentation – source documents or statement provided by an outside party,
- 2) Staff/Intake worker observation – documented by ESG staff within the agency,
- 3) Certification from the person seeking assistance – ESG staff must certify efforts made to obtain third party documentation before allowing applicant to self-certify.

Lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

##### Category 1 Documentation and Certification Requirements

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**Category 2 Documentation and Certification Requirements**

- 1) A termination order resulting from an eviction action that requires the individual or family to leave their residence within 30 days after the date of their application for homeless assistance; OR
- 2) The equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law.

For Category 2 applicants whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs:

- (A) Evidence that the individual or family lacks the resources necessary to reside there for more than 30 days after the date of application for homeless assistance; OR
- (B) An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible.

**To be found credible, the oral statement must:**

- Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance; AND
- Be documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement.

**If the intake worker is unable to contact the owner or renter, documentation must include:**

- Written documentation of the intake worker's due diligence in attempting to obtain verification and written certification that the applicant's statement was true and complete; AND
- Certification by the individual or head of household that no subsequent residence has been identified; AND
- Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.

**Category 3 Documentation and Certification Requirements**

\*Note that ESG projects may only serve Category 3 homeless with explicit permission from AHD. The Category 3 homeless population is expected to be rare in the Balance of State Continuum of Care and ESG Entitlement Area, as most individuals and families will qualify as homeless under one of the other categories.

- 1) Certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 *et seq.*), the Head Start Act (42 U.S.C. 9831 *et seq.*), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e *et seq.*), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 *et seq.*), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 *et seq.*), as applicable; AND

2) Referral by a housing or service provider (third party written), written observation by an outreach worker (staff observation), or certification by the homeless individual or head of household seeking assistance (self-certification), showing that the individual or head of household has not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; AND

3) Certification by the individual or head of household and any available supporting documentation that the individual or family moved two or more times during the 60-day period immediately preceding the date of application for homeless assistance, including: recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; AND

Where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records will be needed.

Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address; AND

4) Written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who is licensed by the state to diagnose and treat that condition); employment records; department of corrections records; literacy, English proficiency tests; or other reasonable documentation of special needs or 2 or more barriers that would cause reasonable expectation that the individual or family will remain homeless by this definition for an extended period of time.

#### **Category 4 Documentation and Certification Requirements**

- 1) If the individual or family is receiving shelter or services provided by a victim service provider:
  - Self-certification OR staff certification of homelessness, documented on the appropriate AHD approved form, stating that the individual or head of household seeking assistance is fleeing; has no subsequent residence; and lacks resources.
- 2) If the individual or family is receiving shelter or services from a non-victim service provider:
  - Self-certification OR staff certification of homelessness, documented on the appropriate AHD approved form, stating that the individual or head of household seeking assistance is fleeing; has no subsequent residence; and lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain housing.
- 3) The documentation must certify that the statement is true and complete;
  - Where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must

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be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

#### At Risk of Homelessness Documentation and Certification Requirements

- 1) In determining the annual income of an individual or family, the recipient or grantee must use the standard for calculating annual income under 24 CFR 5.609. Check guidance for further evidence requirements.
- 2) Evidence of the second eligibility criterion (lacks enough resources to immediately attain housing stability) is:
  - (A) Source documents - notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears.
  - (B) To the extent that source documents are unobtainable, a written statement by the relevant third party - (e.g., former employer, public administrator, relative) or written certification by the intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria of the definition of "at risk of homelessness" OR;
  - (C) If source documents and third-party verification are unobtainable, a written statement by intake staff describing the efforts taken to obtain the required evidence.
- 3) Evidence for documenting at least one of the 7 risk factors is:
  - (A) Source documents - notice of termination from employment, unemployment compensation statement, health-care bill showing arrears, utility bill showing arrears.
  - (B) To the extent that source documents are unobtainable, a written statement by the relevant third party - (e.g., former employer, public administrator, relative) or written certification by the intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria of the definition of "at risk of homelessness" OR;
  - (C) If source documents and third-party verification are unobtainable, a written statement by intake staff describing the efforts taken to obtain the required evidence.
- 4) Evidence for documenting at least one of the 7 risk factors are:
  - (A) Source documents - notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears.
  - (B) To the extent that source documents are unobtainable, a written statement by the relevant third party - (e.g., former employer, public administrator, relative) or written certification by the intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria of the definition of "at risk of homelessness" OR;

- (C) If source documents and third-party verification are unobtainable, a written statement by intake staff describing the efforts taken to obtain the required evidence.

#### DOCUMENTING PERSONS WITH DISABILITIES

A *person with disabilities* means a household composed of one or more persons at least one of whom is an adult who has a disability.

- 1) A person shall be considered to have a disability if he or she has a disability that:
  - (i) Is expected to be long-continuing or of indefinite duration;
  - (ii) Substantially impedes the individual's ability to live independently;
  - (iii) Could be improved by the provision of more suitable housing conditions; and
  - (iv) Is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury.
- 2) A person will also be considered to have a disability if he or she has a developmental disability, as defined in this section.
- 3) A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).
- 4) Notwithstanding the preceding provisions of this definition, the term person with disabilities living together, one or more such persons living with another person who is determined to be important to their care or well-being, and the surviving member or members of any household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his or her death. (In any event, with respect to the surviving member or members of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.)

Developmental disability means, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002):

- 1) A severe, chronic disability of an individual that—
  - (i) Is attributable to a mental or physical impairment or combination of mental and physical impairments
  - (ii) Is manifested before the individual attains age 22
  - (iii) Is likely to continue indefinitely
  - (iv) Results in substantial functional limitations in three or more of the following areas of major life activity:
    - (A) Self-care
    - (B) Receptive and expressive language
    - (C) Learning
    - (D) Mobility
    - (E) Self-direction
    - (F) Capacity for independent living
    - (G) Economic self-sufficiency AND

- (v) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized services.

## **INTAKE, ELIGIBILITY ASSESSMENT AND RE-CERTIFICATION**

All ESG service applicants must participate in an initial consultation to assess needs and to determine program eligibility. The consultation will include verification of homelessness or at risk of homelessness status, assessment of barriers to housing stability, and collection of all relevant HMIS data elements. The Coordinated Intake/Assessment system selected within each Continuum of Care will determine more specific requirements for the intake process.

Grantees and recipients will complete the following procedures:

- Check HMIS (or THE HMIS COMPARABLE DATABASE) to determine if the applicant is currently receiving assistance from any other federal funding sources. Clients cannot receive funding for duplicate services at the same time. A printed HMIS screen can be used as documentation in the applicant's file.
- Collect the required ESG documentation (evidence to establish and verify the client's housing status; copy of documentation to establish annual income; certification that client has insufficient support networks; etc.) as relevant.
- Case Manager will record required HMIS data in the approved COC HMIS data system (or THE HMIS COMPARABLE DATABASE) for all program participants.

If client is not eligible for ESG, grantees and subrecipients are required to include documentation regarding reasons for non-eligibility and to identify other appropriate service providers within the Continuum that can the services.

### **Administration**

Up to 7.5 % of a recipient's (AHD) allocation can be used for Administrative activities. These include general management, oversight, and coordination; reporting on the program, the costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings, the costs of preparing and amending the ESG and homelessness-related sections of the Consolidated Plan, Annual Action Plan, and CAPER; and the costs of carrying out environmental review responsibilities. AHD uses the administrative funds to administer the ESG grant programs.

### **Strategic Plan to Solve Homelessness in Anchorage, the Anchored Home Plan 2018 - 2021**

Service and housing support for those experiencing homelessness comes from government entities, housing providers, and social services organizations. This network of housing and supports is called a Housing & Support System. Through a collaborative planning effort, we have gained a shared, centralized understanding of the current system to increase and provide more efficient services to people experiencing homelessness.

Ending homelessness is not easy. Through the Anchored Home: 2018-2021 Plan, a combination of federal, state and local strategies is gathered. The plan is to remain focused on homelessness. The plan addresses socioeconomic factors and community needs. Anchored Home was developed in partnership with the Anchorage community through a series of discussions, open forums and gatherings.

#### **Core Purpose**

Anchored Home identifies concrete actions to make homelessness a rare, brief and one-time event. Anchored Home is an action-oriented roadmap for the next three years that combines community, state and federal plans. The private sector, public sector and individual community members will help to implement this plan, including securing additional resources to meet our community's needs. This work is driven by a collective action partnership among the community, the Municipality, businesses, housing providers, supportive service providers, community-based providers and other stakeholders. Anchored Home seeks to represent the voices of our community members, including those with existing experiences of homelessness

#### **Four Key Pillars of Anchored Home**

Anchored Home directs resources to four pillars to solve homelessness and improve community livability.

1. Promoting **Prevention & Diversion** from homelessness
2. Growing the **Housing & Support System**
3. Improving **Public Health & Safety**
4. Increasing **Advocacy & Funding** to bolster our efforts

#### **Data Gathering Types**

Anchorage uses a Point-in-Time Count, which is a snapshot of homelessness gathered at one time each year, on the same day as every other participating community in the United States. Additionally, Anchorage uses the Homeless Management Information System (HMIS) across Alaska to collect information on individuals and families experiencing homelessness based on provider information. HMIS tracks the number of people experiencing homelessness through a Housing & Support System and provides logistics on key measures and the results obtained for the data collected.

The goal of the Coordinated Entry System is to match a person experiencing homelessness with housing and supports to meet their needs, whether that is a short-term emergency shelter stay or long-term permanent housing. Anchorage implemented its Coordinated Entry System in January 2017 and continues to make improvements and add new partners.

To get there, Anchorage will need to build a sustainable data-driven system of supports that adequately meets the needs of people experiencing homelessness. This work must be driven by a collective action partnership among the community, the Municipality, businesses, housing providers, supportive service providers, community-based providers and other stakeholders.



The Municipality of Anchorage, Anchorage Health Department, ADRC Unit administers the Homeless Prevention Program 24 CFR 576.103.

<b>Component: Homelessness Prevention. These activities are designed to prevent an individual or family from moving into an emergency shelter or living in a public or private place not meant for human(s) habitation through housing relocation and stabilization services and short and / or medium-term rental assistance. 24 CFR 576.103</b>		
<b>Activity types:</b>		
<b>Rental Assistance**</b>	<b>Housing Relocation and Stabilization Services</b>	
Eligible costs:	Financial Assistance	Services Costs
Short-term rental assistance	Eligible costs:	Eligible costs:
Medium-term rental assistance	Rental Application Fees	Housing Search and Placement
Rental arrears	Security Deposits Last	Housing Stability Case
**Rental assistance can be project-based or tenant-based.	Month's Rent Utility Deposits	Management
	Utility Payments	Mediation
	Moving Costs	Legal Services
		Credit Repair

**HP Procedures**

Due to limited ESG resources MOA as the local recipient, awards ESG Homelessness Prevention funds to provide housing relocation and stabilization services by means of short-term and/or medium-term rental assistance necessary to prevent the individual or family from becoming homeless as defined by HUD's definition in 24 CFR 576.2.

The Municipality of Anchorage, Anchorage Health Department (MOA, AHD Emergency Solutions Grant Program (ESG) referred by 2-1-1 as the Municipality's Homeless Prevention Program (MHPP) provides federal funds to assist consumers and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. Municipal ESG funds are available for homeless prevention (rental assistance).

Component services and assistance generally consist of short-term and medium-term assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services and credit repair, refer to 24 CFR 576.103, 576.105, and 576.106.

The following requirements apply to eligible beneficiaries for MOA **Homeless Prevention** services:

- 1) Please see definition of "At-Risk of Homelessness" in this document.

#### **BASIC ELIGIBILITY REQUIREMENTS OF HOMELESS PREVENTION**

- A. Determination of eligibility for homeless prevention requires an in-person assessment to verify that consumers meet HUD's categorical definition for imminent risk of homelessness, homeless under other federal statutes, or at risk of homelessness.
- B. Consumers for assistance have an annual household income at 30% or below of area median income.
- C. Consumers must lack resources and support networks which could provide financial assistance.
- D. Documentation that the assistance would likely allow the applicant to regain stability in their current permanent housing or access other permanent housing and achieve stability.
- E. The rental property must meet HUD Occupancy Standards, Habitability Standards and Lead-Based Paint Requirements.

#### **ELIGIBLE ACTIVITIES AND ASSISTANCE**

ESG funds may be used to pay landlords for the following rental related expenses.

- A. Rental assistance and / or security deposit.
- B. An eviction notice based on 30 days past due rent.
- C. Component services and assistance generally consist of short-term and medium-term assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services and credit repair, refer to 24 CFR 576.103, 576.105. and 576.106.

**Please note – financial assistance cannot be provided to an ESG consumer who is receiving the same type of assistance through other public sources.**

#### **INELIGIBLE ACTIVITIES AND ASSISTANCE**

- A. Payments made directly to program consumers or their family members.
- B. Payments made on mortgage or land contract.
- C. Payment of rent for the same period and for the same cost types being assisted through other federal, state, or local housing subsidy program.
- D. Payment on credit cards bills or other consumer debt, including child support or garnishments.
- E. Provision of cash assistance.
- F. Payment cost of discharge planning in mainstream institutions such as hospitals, nursing homes, jails or prisons.

#### **GENERAL REQUIREMENTS**

- A. Confidentiality – All information about the consumer is confidential. Information will only be disclosed for determining program eligibility, providing benefits, investigating possible

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violation of federal, state and local regulation(s) associated with ESG delivery and other legal disclosures and never in a setting where members of the public can hear the conversation.

- B. Release of Information – Consumer information (including identifying the person as a consumer) should not be released without written authorization from the consumer. A Release of Information (ROI) form must be completed by the applicant at the time of intake.
- C. Grievance and Appeals –
  - 1. All consumers shall be afforded the opportunity to file a grievance or appeal any decision that denies (for any reason) or limits eligibility of the consumer or terminates or modifies any financial assistance decision.
  - 2. A consumer shall have a minimum of thirty days within which to request an administrative review.
  - 3. All requests shall be in writing to the ESG Program Manager and provide facts as to why the decision shall be reversed.
  - 4. The ESG Program Manager shall provide a memorandum identifying the facts regarding the decision and forward the memorandum, the consumer appeal letter and the entire consumer file for determination by the Division Manager.

#### **ESG SCREENING PROCESS**

- A. ESG applicants may either contact Alaska 211 or the Municipality for assistance. A consumer will be asked 5 prescreening questions. If the applicant initially contacts 211, a list of those that appear to be eligible based on the prescreening questions will be shared daily with the Municipality. An ADRC Resource Specialist will contact the caller to begin the application and further determine eligibility.
- B. 2-1-1 personnel will use the following prescreening questions.
  - 1. Do you live in the Municipality of Anchorage? Answer Yes.
  - 2. Do you feel threatened by an eviction or have an eviction notice? Answer Yes.
  - 3. Have you or other adults in your household worked or had other income in the last 30 days? Answer Yes.
  - 4. Are you receiving rental assistance or a housing voucher? Answer No.
  - 5. Have you or someone in your household received rental assistance from the Municipal Homeless Prevention Program in the last 12 months? Answer No.
- C. If all the prescreening questions are answered correctly, the 2-1-1 Information and Referral (I&R) Specialist will record the caller's name and contact information and provide a list of callers to the ADRC Resource Specialist daily.
- D. If all the prescreening questions are NOT answered correctly, the 2-1-1 I&R Specialist and the ADRC Resource Specialist will search for other appropriate referrals to the client.

#### **Client Contact for ESG Rental Assistance**

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- A. **ADRC Message Script.** In addition to the message about ADRC services, a short message will be added to the ADRC main Information & Referral (I &R) telephone line advising clients when the ESG program will be opened.
- B. **Consumers requesting ESG** assistance through other AHD numbers or personnel will be instructed to call ESG hotline 2-1-1 and follow voice mail instructions. Consumers will be screened in the order calls are received on the ESG hotline.

**ESG ELIGIBILITY DETERMINATION PROCESS**

Consumers will be further screened by ESG Resource Specialist by telephone to determine program eligibility. If it is determined that the caller appears eligible for services, an appointment will be set for assessment. Please note – an appointment with an ESG Resource Specialist does not constitute eligibility for program funds. Eligibility is determined at the time of assessment. In general, appointments are scheduled within 24-48 business hours and are based on funding. The hotline will be updated regularly by ESG Resource Specialist to indicate the status of the program.

- A. ESG Resource Specialist will review and sign off on the prescreening form to determine if the consumer is eligible for the program. If the consumer does not meet the requirements, there is no need to continue with the eligibility screening process.
- B. Due to limited resources and consistent with the Anchorage continuum of care requirements to serve the most in need, all consumers must meet the targeting criteria to be eligible for the program.
- C. ESG Resource Specialist will need to ensure that the information in the targeting criteria matches the information provided in the ESG application form. (i.e. dependents, income information, employment, disability, etc....)
- D. ESG Resource Specialist will sign off on the Stage 2 of the disposition form to reflect that either the consumer meets or does not meet the targeting criteria. If the consumer does not meet the targeting information, there is no need to continue with the Eligibility Screening form.
- E. ESG Resource Specialist will print and sign the ESG screening form.
- F. ESG Resource Specialist will document unsuccessful consumers using the declined assessment spreadsheet. The spreadsheet will include the consumers name, address, telephone number and reason for denial.

Consumers that successfully complete the prescreening and eligibility process will be scheduled for an appointment.

**ELIGIBILITY DETERMINATION**

- A. **Rent Reasonableness Determination** – ESG Resource Specialist must determine whether the gross rent is a reasonable rent in comparison to rent for other comparable unassisted units. The information listed below must be considered when making this determination:
  - 1. The location, quality, size, unit type and age of the rental unit.

2. Any amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease.
  3. The rental unit's gross rent must be comparable to the Fair Market Rent (FMR) established by HUD for each geographic area as per 24 CFR 888 and 24 CFR 982.503 and complies with HUD's standard of rent reasonableness as established under 24 CFR 982.507.
  4. The method to establish some Rental Reasonableness standards will be documented through the review of advertisements of comparable rental units. Rent must meet rent reasonableness standards and cannot exceed HUD's published FMRs for the area.
  5. The FMR Requirement is waived for ESG-CV funds.
- B. Fair Market Rent (FMR) Determination – FMR is established by HUD to determine rent ceilings for HUD-funded rental assistance and will be the basis for determining FMR for the ESG program.
1. The current FMR for Anchorage as determined by HUD.
  2. Information will be updated by ESG Resource Specialist immediately after HUD issues the new FMR amounts.
  3. The rent for the unit assisted with ESG must not exceed the lesser of the FMR or the rent reasonableness standard as per 24 CFR 576.106(d).
- C. Calculating Gross Rent - Whether a household is seeking to maintain its current housing or relocate to another unit to avoid homelessness, or exiting homelessness into new permanent housing, the process for determining acceptable rent amounts is as follows. The gross rent (rent plus appropriate utility allowance) must be no greater than the FMR standard by HUD and fit within the limitations resulting from a Rent Reasonableness analysis.
1. Gross rent is the sum of the rent paid to the owner plus, if the tenant pays separately for utilities, the monthly allowance for utilities established by the public housing authority for the area in which the housing is located. For purposes of calculating the Fair Market Rent (FMR), utilities include electricity, gas, water and sewer, and trash removal services but not cable or satellite television service, or internet service.
  2. The rent for the unit being assisted with program funds cannot exceed the lesser of the FMR or the Rent Reasonableness Standard.
  3. If the gross rent for the unit exceeds either the Rent Reasonableness Standard or FMR, no ESG funds may be used for any portion of the rent, even if the household is willing and/or able to pay the difference.
  4. FMR and Rent Reasonableness requirements do not apply when a program consumer receives only financial assistance or services. This includes rental application fees, security deposits, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

D. The following formula will be used to calculate Gross Rent Amount of a unit.

1. Total contract rent amount of the unit, plus
2. Allowable fees (excludes late fees and pet fees) required for occupancy under the lease, plus
3. Monthly utility allowance established by local public housing authority.
4. Example: A 2-bedroom unit has a rent of \$1,200 per month, not including utilities. The utility allowance for that size and type of unit is \$150 per month. Therefore, the gross rent is \$1,350. A check of three similar units in the neighborhood reveals that a reasonable rent is \$1,400. However, the FMR for the jurisdiction is \$1,300. This means that the household cannot be assisted with ESG rental assistance in this unit because the gross rent exceeds the FMR.

**ESG consumers will be advised that appointment does not constitute eligibility for the ESG program.**

**ESG Application Process**

Once the pre- application and eligibility process is complete, the ESG Resource Specialist will review the ESG proof of eligibility forms to determine the necessary documentation to bring in for the office appointment. Additionally, the ESG consumers will need to submit the following documentation.

**RENTAL AND UTILITY ASSISTANCE**

<b>RENTAL ASSISTANCE</b>	<b>RENT DEPOSIT/1<sup>ST</sup> MONTH'S RENT</b>
Eviction Notice	Rental Agreement
Rental agreement	Proof of Income (pay stubs, federal assistance award letters bank statements, letter from employer, etc.)
Proof of Income (pay stubs, federal assistance award letters bank statements, letter from employer, etc.)	Referral letter or statement of homelessness (if in a shelter or transitional housing)
Photo ID (driver's license, passport, etc...)	Photo ID (driver's license, passport, etc...)
SSN for each member of the household	SSN for each member of the household

**DOCUMENTATION**

If a new job and no first paycheck; the consumer will submit a signed statement from their supervisor stating name of the company and employee; wage, hours per week worked (or to be worked) and a signature block with contact information.

**ESG Application Form** – All information on the application form must be filled out and collected and signed and reviewed by both the ESG consumer and ESG Resource Specialist.

Section title	Section area	Comment
Section 1	Applicant information	All information must be completed in this section
Section 2	Applicant profile	This information is needed for AKHMIS entry purposes
Section 3	Household members	This information is needed to determine financial eligibility for household income
Section 4	Housing information	All information in this section must be completed in its entirety
Section 5	Reason for request/Current situation	All information in this section must be completed in it's entirety.
Section 6	Current situation	All information in this section must be completed in it's entirety. This section will also assist the ESG Resource Specialist in completing the consumer sized service plan.
Section 7	Other Services	ESG funds cannot be used if financial assistance is available from other agencies.
Section 8	Family Income	All sources of income must be identified and supporting income bank balance documentation provided.
Section 9	Regularly monthly expenses	This section must be completed in its entirety
Section 10	Initial request for service/assistance	If assistance is approved, the ESG Resource Specialist will need to contact the vendors to obtain their address, EIN, SSN and W-9.
Section 11	Verification of information	The ESG Resource Specialist will obtain a copy of all information required in this section.
Section 12	Applicant statement of certification and referral information	The applicant must sign and date the certification. The ESG Resource Specialist must complete the "referred by' and referred to" sections.

**Homeless Assessment Matrix** – all questions must be answered and recorded. The ESG consumer will be informed that the ESG Resource Specialist will conduct a follow up assessment at which time the matrix questions will be asked again to assess the consumer's progress.

#### **PROPERTY INSPECTIONS/ HOUSING HABITABILITY CHECKLIST**

Prior to the commitment of funds, the ESG Resource Specialist will make arrangements and conduct an inspection of the property.

Habitability standards – The ESG Resource Specialist will use the ESG Housing Habitability Standards Inspection Checklist for inspection of the unit to ensure that the property meets HUD housing standards for the ESG program.

- 1) Place either an “A” for approval or “D” for deficient in the appropriate box for each of the inspection elements.
- 2) Place an “X” in the boxes that reflect the results of the inspection.
- 3) The ESG Resource Specialist will complete the balance of the form in its entirety and sign the form.
- 4) No funds will be disbursed prior to the approved habitability inspection.

Due to the threat of community spread of COVID-19, all inspections for ESG rental assistance will be completed virtually. The ADRC Resource Specialist will work together with the ESG recipient on the best technical method to use for the inspection. This will be based on what technology the ESG recipient has available. The most common method will likely be cell phone video.

#### **LEAD-BASED PAINT INSPECTION**

The lead-based paint remediation requirements of 24 CFR 576.403(a) apply to all housing occupied by ESG program participants.

- 1) All ESG Resource Specialist will successfully complete the HUD lead-based Paint Internet certification training.
- 2) The ESG Resource Specialist will utilize the Anchorage Property Appraisal website to determine the year that the property was built. The document will become a permanent part of the consumer file.
- 3) For units older than 1978 and which house one or more children under 6 years of age, the landlord and tenant must complete and sign the Lead-Based Paint Disclosure form. The disclosure form will also document the ESG consumers receipt of lead-based paint hazard information pamphlet.
- 4) The ESG Resource Specialist will use the Housing Prevention and Rapid Re-Housing Lead Screening Worksheet to determine if the property requires a lead-based paint inspection and to walk them through the inspection process.
- 5) No funds will be distributed prior to the lead-based paint inspection approval.



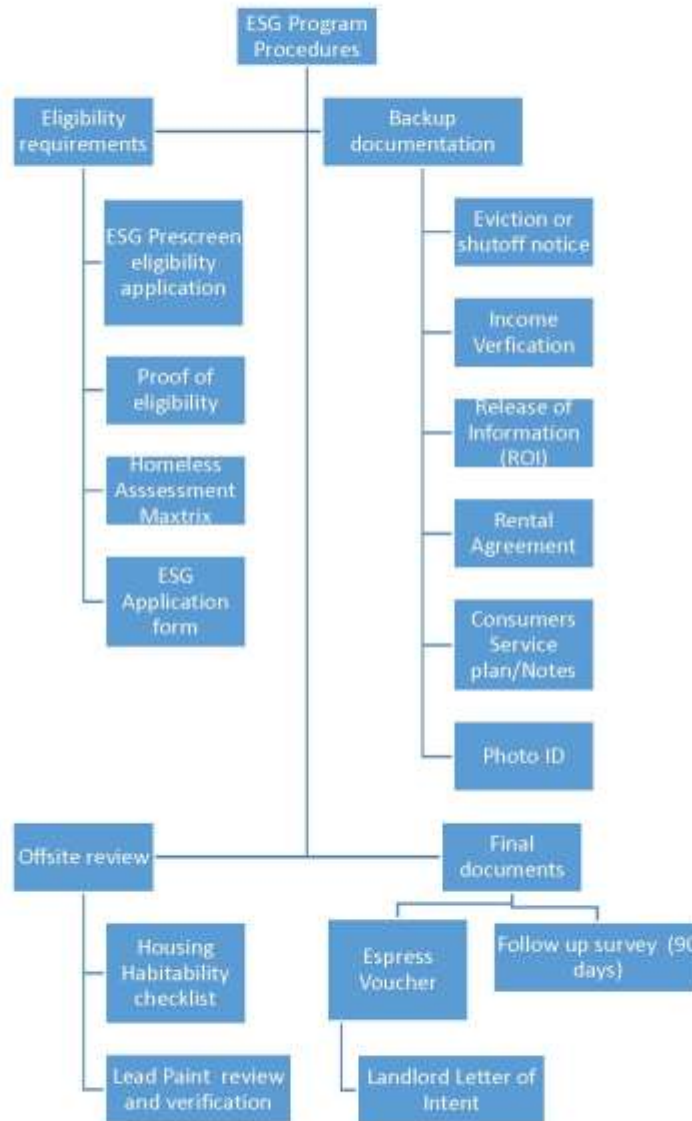
#### **FOLLOW UP SURVEY – HOUSING STABILITY / CASE MANAGEMENT**

*Housing Stability Case Management.* As required by 24 CFR 576.401(a) and (c), the recipient and its subrecipient must determine the available services and assistance that each ESG-CV program participant will need to achieve independent living and avoid further housing instability or homelessness, and the recipient and its subrecipient must assist each ESG-CV program participant, as needed, to obtain those services and assistance.

The ESG Resource Specialist will conduct check-in's with assisted households every 30 days for up to six months after receiving rental assistance. The purpose of the follow-up is to assist in stabilizing the household further and help the household sustain long term housing. The following resources can be used for the check-in process:

- A. Service Plan goals which were discussed at time of application.
- B. Review of the Homeless Assessment Matrix which was completed at time of application. It is expected that all efforts to complete activities on behalf of the consumers will be done in a timely manner. The ESG Resource Specialist will provide updates to the Program Manager and any outstanding consumer's charts will be reviewed to determine the action steps need to complete the file.
- C. File storage – All completed consumers files will be kept in a locked ESG file cabinet except when ESG Resource Specialist is actively working on a case. All active and completed files will be locked up at the end of the day.

Flow Chart Checklist



### ESG-CV Considerations

ESG-CV means the Emergency Solutions Grants Program as funded by the CARES Act and governed by requirements HUD establishes in accordance with that Act. ESG-CV funds do not include annual ESG funds (e.g., FY 2020 ESG grant funds), although annual ESG funds may be used in accordance with the requirements established for purposes of ESG-CV funds as further described in Section IV of CPD-20-08.

When using ESG-CV funds, the following waivers, restrictions, and flexibilities to annual ESG policies and procedures apply.

#### PURPOSE

The ESG-CV funds must be used to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus. Requirements at 24 CFR Part 576 will apply to the use of these funds, unless otherwise provided by the alternative requirements and flexibilities established under the CARES Act, Notice CPD-20-08, or subsequent waivers, amendments, or replacements to this Notice. Consumers must be at imminent risk of homelessness, homeless under other federal statutes; fleeing/attempting to flee domestic violence or meet the criteria for being at risk of homelessness and have an income at or below 50% of median income. Eligible consumers must lack the resources or support networks to help them retain or obtain appropriate, stable housing.

#### Environmental Review Requirements

Part 58 requirements apply except for those temporary shelters the applicable state or local health official has determined necessary to prevent, prepare for, and respond to coronavirus. Environmental review required prior to a commitment to cover or reimburse ESG funds.

#### Additional Eligible Activities

- 1) Temporary Emergency Shelter
  - a) Funding can be used for a structure or portion of structure used for limited time because of the COVID-19 Pandemic to provide shelter to individuals and families displaced from their normal place or residence or shelter/unsheltered locations.
    1. Local public health official must first determine that temporary emergency shelter is necessary for community's coronavirus response.
    2. The temporary emergency shelter can only be in use for the period of time needed for coronavirus response. Time limited to January 31, 2022 unless HUD grants an exception.
- 2) Training

- a) Funds may be used for training on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness.
  - 1. This training is not considered an administrative cost and is, therefore, not subject to the 10% administrative cap on funding.
  - 2. These training costs are eligible as a standalone activity and are not to be charged to an activity under 24 CFR 576.101 to 24 CFR 576.109.
  - 3. Budget costs under the Street Outreach component in IDIS and report costs as a unique budget line item under Street Outreach.
- 3) Hazard Pay
  - a) Funds may be used to pay hazard pay for recipient or subrecipient-staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness.
  - b) Examples of recipient or subrecipient staff working directly in support of coronavirus response include:
    - 1. street outreach teams
    - 2. emergency shelter intake, maintenance and security staff
    - 3. staff providing essential services (e.g., outpatient health or mental health, housing navigators)
    - 4. staff in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus
- 4) Handwashing Stations and Portable Bathrooms
  - a) Funds may be used to install and maintain handwashing stations and bathrooms in outdoor locations for people experiencing unsheltered homelessness.
  - b) Allowing these costs will help prevent the spread of coronavirus by providing people living in unsheltered locations regular access to bathrooms and the ability to wash their hands.
- 5) Landlord Incentives
  - a) Funds may be used to pay for landlord incentives that are reasonable and necessary to obtain housing for individuals and families at risk of or experiencing homelessness.
  - b) A recipient may not use funds to pay the landlord incentives an amount that exceeds three times the rent charged for the unit.
  - c) Eligible landlord incentive costs include:
    - 1. Signing bonuses equal to up to 3 months of rent;
    - 2. Security deposits equal to up to 3 months of rent;
    - 3. Paying the cost to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit; and,

4. Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.
- 6) Volunteer Incentives
    - a) Funds may be used to pay to provide reasonable incentives to volunteers who have been and are currently helping to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the coronavirus outbreak. A recipient may not use ESG-CV funds to pay the landlord incentives an amount that exceeds three times the rent charged for the unit.

**Waivers:**

The following requirements are waived for ESG-CV funds:

- 1) Emergency Shelter and Street Outreach Expenditure Limit Waived.
- 2) Match requirements are waived for ESG-CV and prior annual ESG funds used to prevent, prepare for, and respond to coronavirus.
- 3) Fair Market Rent limit is waived but units must still meet Rent Reasonableness Standards.
- 4) Monthly case management requirement at 24 CFR 576.401(e)(1) are waived.
- 5) Funds are not subject to the CoC consultation requirements at 24 CFR 576.400(a).
- 6) Requirements for coordination with other targeted homeless services at 24 CFR 576.400(c) are waived.

**Alternative Requirements:**

- 1) The following program aspects have alternative program requirements:
- 2) Cap for Administrative costs increased to 10%.
- 3) Recipients may pay for HMIS Lead activities even if they are not an HMIS Lead.
- 4) Recipients (\*not subrecipients\*) may deviate from federal procurement standards; must establish alternative written procurement standards.
- 5) 24-month limit on rental assistance and supportive services costs under RRH & HP extended for 6 months for households who reach max between 1/21/2020 and 2/28/2021.
- 6) Medium-term Rental Assistance limited to 3-12 months instead of 3-24 months.
- 7) Emergency Shelter activities may be provided only until January 31, 2022.
- 8) Must not require treatment or any other prerequisite activities as a condition for receiving ESG assistance (includes case management) as a provision for receiving service.
- 9) Must establish and maintain adequate procedures to prevent any duplication of benefits.
- 10) Recipient must publish how it used and will use its ESG-CV allocation on <https://www.muni.org/pages/default.aspx>.

Definitions apply from 24 CFR 576.2 apply, except that:

The CARES Act raised the income limit in paragraph (1)(i) of the “at risk of homelessness” definition at 24 CFR 576.2 from 30 percent of area median income to the Very Low-Income limit of the area ( 50%) , as determined by the Secretary. The entire definition of “at risk of homelessness,” incorporating the higher income limit for ESG-CV activities, is included below for reference.

Definitions apply from 24 CFR 576.2 apply, except that:

The CARES Act raised the income limit in paragraph (1)(i) of the “at risk of homelessness” definition at 24 CFR 576.2 from 30 percent of area median income to the Very Low-Income limit of the area ( 50%) , as determined by the Secretary. The entire definition of “at risk of homelessness,” incorporating the higher income limit for ESG-CV activities, is included below for reference:

At risk of homelessness means a) an individual or family who has an annual income that does not exceed the very low income limit of the area, as established for HUD’s Section 8 and Public housing programs at [www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html) b) does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the homeless definition in 24 CFR 576.2, and meets one of the following conditions:

- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance.
- Is living in the home of another because of economic hardship.
- Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance.
- Lives in a hotel or motel and the cost is not paid for by charitable organizations or by federal, state or local government programs for low-income individuals.
- Lives in an SRO or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than one-and-a-half persons per room.
- Is exiting a publicly funded institution or system of care; or
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Consolidated Plan.

24 CFR 576.106(a)(2), where medium-rent is defined as “for more than 3 months but not more than 24 months of rent” is waived and an alternative requirement is established where medium-term is established as for more than 3 months but not more than 12 months. This alternative

requirement will allow more households to receive rapid re-housing and homelessness prevention assistance, which is necessary to prevent, prepare for, and respond to coronavirus.

HUD is making an across-the-board waiver of the ESG requirement in 24 CFR 576.401(e)(1) that housing stability case managers to meet not less than once per month with each program participant receiving homelessness prevention or rapid re-housing assistance. HUD is waiving this requirement for all program participants receiving this assistance after qualifying as homeless, to be consistent with the CARES Act prohibition stated in section III.F.10. Additionally, HUD is waiving the requirement for all program participants receiving assistance after qualifying as at risk of homelessness, to prevent the spread of coronavirus and reduce the barriers to providing the homelessness prevention that is necessary to respond to coronavirus. This waiver provides additional regulatory relief beyond the waiver HUD made available on March 31, 2020 for annual ESG funds and extended on May 22, 2020 for annual ESG funds and ESG-CV funds, by lifting the 3-month limitation established May 22, 2020, and making the waiver of 24 CFR 576.401(e)(1) apply throughout the period the recipient or subrecipient uses funds to prevent, prepare for, and respond to coronavirus.