

**HAFP-0197-Alaska**  
**Treasury Feedback for Resubmission of Plan**

Please revise the HAF plan by providing a response to the questions below.

**Completeness**

- No questions.

**Homeowner Needs and Community Engagement**

**Data**

- No questions.

**Community Engagement and Public Participation**

- Your plan indicates that only 1 organization involved in your public input process primarily serves low- or moderate-income populations or addresses housing discrimination. Please explain how the program is confident in its ability to reach targeted populations without engaging such organizations in planning and implementation.

Alaska Housing Finance Corporation (AHFC) is also the Public Housing Authority for the entire state of Alaska. In addition to our Public Housing and Housing Choice Voucher (aka Section 8) funds, we administer several state and federal homeless and supportive service grants throughout the state via 30+ nonprofit housing partners. Additionally, AHFC works collaboratively with the Association of Alaska Housing Authorities (AAHA) to coordinate efforts with our regional housing authority partners who serve tribal members throughout the Alaska.

Directly and through our grantee partners, AHFC has extensive experience addressing housing discrimination by providing housing opportunities to low-or moderate-income populations. These strong and sustainable partnerships with non-profit social service agencies, Community Housing Development Organizations and other government agencies help ensure that program goals are met and that all target populations are reached by program outreach and enrollment efforts.

Most recently, our partnerships with the grantee and AAHA partners were leveraged to support the outreach and implementation of the Emergency Rental Assistance Program. Our collective efforts resulted in 10% of the statewide population responding with applications (1/3<sup>rd</sup> of all rental units in the state). The under-represented minority populations were over-represented in our application response and over 80% of the applications were from households at or below 50% area median income.

We intend to move forward with a similar outreach plan with our partners to ensure full statewide coverage and access for all Alaskans, with particular focus given to the service areas of our tribal partners who in many cases serve regions off the road system with disparate access to technology.

- Your plan notes public input and community engagement in the plan development process. Please explain how community engagement informed your plan's programmatic and outreach design.

During the open public comment hearings, members of the public and partner organizations offered input that provided insight on housing needs that are unique to Alaska. Due to a large and diverse geographic area, Alaska has distinctive rural characteristics which include large regions of the state that

are not connected to the road system. Engaging with our tribal and non-profit partners and members of the public in these hearings helped inform us of different regional challenges that need to be addressed when designing the program plan and outreach efforts.

AHFC also hosted community engagement opportunities for loan servicers and the Association of Alaska Housing Authorities (AAHA) which represents Alaska's 14 regional housing authorities. Collectively, these 14 housing authorities represent nearly 200 federally recognized tribal entities. The partnership with AAHA members was instrumental in the implementation of the Emergency Rental Assistance program and we expect it to be integral to the HAF program outreach and implementation as well. The dialog and engagement helps ensure that programmatic and outreach design includes input from partners with regional expertise on housing and homeowner needs.

- Please provide an update on your efforts to coordinate with Tribes and Alaskan Native Corporations.

In the dialogue with the Association of Alaska Housing Authorities (AAHA), several of the tribally designated housing entity members expressed interest in partnering with AHFC to develop their HAF plans. Collectively, AAHA represents nearly 200 federally recognized tribal entities. During the Emergency Rental Assistance Program, 12 organizations representing federally recognized tribes partnered with AHFC to leverage shared infrastructure and 10 participated as funding partners.

AHFC is working with several of the AAHA member organizations to develop strategies to help streamline outreach and programmatic efficiencies such as collaborating to develop a statewide HAF registration portal that can be used by tribally designated housing entities.

- Please provide an update indicating any public comments you have received since you submitted your HAF Plan, from which organization you received any such comment, and whether you have responded to the comments.

During the two public comment hearings, AHFC recorded the audio of the meetings. Many of the general comments and questions were answered live during these hearings and can be viewed in the meeting transcripts.

In addition to comments from the general public, several organizations also submitted comments and questions including:

Anchorage Coalition to End Homelessness  
Alaska Coalition to End Homelessness  
Brother Francis Shelter  
Association of Alaska Housing Authorities  
Cook Inlet Housing Authority  
HUD, Anchorage Field Office  
Northwest Inupiat Housing Authority

All questions and comments regarding the HAF plan have been responded to.

***Ongoing Assessment of Homeowner Need***

- Please explain how the program will address changes in homeowner needs in the coming years.

The program design is flexible to help address different homeowner needs on an individual basis. Program

funds can be allocated to mortgage payment assistance, mortgage reinstatement, mortgage principal reduction, payment assistance for utilities, insurance, homeowner or condominium association fees and property taxes. Since some homeowners may experience a Covid-19 hardship that could affect one or all of these categories, AHFC will be able to support homeowners based on their individual needs. Over time, the program will be able to adapt to changing homeowner needs since homeowners can qualify for different types of assistance that are included in the program umbrella.

### **Program Design**

- Will there be a method in your HAF program, early in the process of engaging with a household, to evaluate immediate threats to the housing stability of applicants, which may need to be addressed under an expedited or prioritized timeline (e.g., HOA liens, tax delinquencies, utility shut off)?

Yes. In the application portal, homeowners will be asked a series of questions that will evaluate the stability of their housing and identify immediate threats to their housing status. Applicants who are experiencing an immediate threat to their housing stability will be prioritized and their applications will be processed before applicants who indicate they have a relatively stable housing status. Applicants will also be provided information about other potential resources and programs from their servicers and will be referred to a housing counseling agency that may assist homeowners with their HAF application and to help identify additional resources. Applicants will also provide shut-off and delinquency letters to help AHFC prioritize immediate homeowner needs.

- Please describe how your program will utilize housing counselors or legal services to assist homeowners in evaluating loss mitigation options available for their mortgage. Your description should include:
  - whether your program will connect homeowners with housing counseling or legal services early in the process.
  - the role housing counseling or legal services providers will play in supporting homeowners' efforts at engaging in loss mitigation.

As part of the application process, homeowners will be referred to additional resources that may help them stabilize their housing status including housing counseling or legal services. All applicants will receive a referral when they first apply for assistance in the application portal. Housing counseling and legal services can help homeowners identify additional resources and may help homeowners work through the process of loss mitigation when they are working with their mortgage servicer.

Borrowers are encouraged to work with a housing counselor that is provided by their mortgage servicer through the loss mitigation process. Through a servicer, housing counselors can review a borrower's current and full financial situation and provide guidance and options available.

- How will your program leverage resources available through a loss mitigation process to benefit eligible homeowners and how will your program avoid using HAF funds in ways that duplicate relief that available loss mitigation options might provide? In particular, when HAF assistance will be limited to payments for mortgage reinstatement, please explain whether and how you will assess what loss mitigation may be available through the servicer.

If a homeowner has a mortgage and has not worked with their servicer to go through a loss mitigation

process, AHFC will strongly encourage the homeowner to talk with their servicer about their loss mitigation option. If a homeowner has already gone through loss mitigation and is still experiencing a Covid-19 hardship, they may qualify for monthly homeowner assistance. AHFC will encourage homeowners to leverage resources available through loss mitigation but will not require loss mitigation to receive HAF assistance.

Many borrowers should be expected to work with their servicers for loss mitigation options available first. Servicers are required to follow Investor, Guarantor, and Insurer guidelines as they work with borrowers through loss mitigation.

- Please explain what steps, if any, your program will take to assist the homeowner in determining whether a HAF-resolution will result in a sustainable monthly payment?

As part of the application, homeowners will be asked to submit their current monthly household income and expenses. AHFC will work with the homeowner to identify additional resources such as loss mitigation with their servicer to help supplement HAF funds. Although AHFC will have some information that may help evaluate if the HAF-resolution will result in a sustainable monthly payment, homeowners will not be disqualified from HAF if their current monthly income does not achieve a sustainable level to maintain current expenses.

For borrowers working with their servicer on loss mitigation, AHFC will use the underwriting detail from the Common Data File (CDF) to help evaluate the sustainability of a borrower's ability to make ongoing payments and will work with borrowers and their servicers to identify additional resources.

- Are you anticipating increased winter home energy costs and their potential impact on the homeowners that HAF will serve?

Yes, home energy costs typically increase during winter months. We anticipate that some homeowners may need more utility assistance during winter months due to increased energy and heating expenses.

- Your programs set \$20,000 as the maximum amount of assistance per homeowner. Please explain how you determined this amount will be sufficient to resolve housing-related delinquencies and whether the cap will be sufficient in areas with higher housing costs?

The \$20,000 program maximum amount was determined as part of the data analysis process. In addition to the federal lending data, AHFC extrapolated our internal mortgage data to estimate the level of homeowner need for Alaska. The percentage of homeowners in AHFCs portfolio which were delinquent or in forbearance was used to extrapolate the total need in Alaska based on AHFCs share of statewide mortgages. Although alternative maximum amounts were considered, \$20,000 was decided based on the data analysis and estimate of the number of homeowners in need statewide and the estimate of the total financial need across the state. Since the request for funds might exceed the amount of total funds available, we found it was necessary to establish an upper limit for assistance per household to facilitate representative service delivery for the entire State.

### ***Eligibility***

- Please provide the rationale for not using a fact-specific proxy as one method for establishing eligibility under your plan, including how you determined that without such a proxy, your program can avoid unnecessary barriers to participation by eligible homeowners.

Although AHFC is not planning to use a fact-specific proxy to establish income eligibility, we are planning to use self-attestation to help avoid unnecessary barriers to participation by eligible homeowners. AHFC also plans to use a fact-specific proxy to help target outreach efforts by focusing on zip codes that tend to have low income rates and high rates of socially disadvantaged populations.

Requiring some documentation will help ensure the best outcome for the borrower when using HAF funds.

In our administration of the Emergency Rental Assistance Program, we were able to conduct a limited review of income documentation for eligibility without disrupting service delivery. With over 30,000 applications to review, our team was able to complete the income reviews for over 25,000 households within a matter of 3 weeks. We understand that other states were not able to do this, but we were. The net effect is that we identified over 1,000 households that were substantively over-income that had requested tens of millions of dollars in program funds. Our review enabled us to ensure those funds were instead used for households that were truly very low-income.

In our experience, limited due-diligence and expeditious service delivery were not mutually exclusive goals. We have the staff and technical infrastructure in place and to complete any income reviews quickly.

### ***Outreach***

- Please explain how the program will target outreach and provide access to homeowners with limited English proficiency.

Building on its successful marketing of the emergency rental assistance program, AHFC has already collected more than 8,000 email addresses from the public interested in HAF. AHFC will leverage its relationships with the banking community as well as other relevant organizations including tribal authorities, Alaska Legal Services, statewide courts, local school districts and libraries, and others to share relevant messages about the program and actively encourage participation. Paid print and radio advertising will include messages shared in Spanish and Tagalog. AHFC will utilize Google Translate and leverage its existing websites ([www.AHFC.us](http://www.AHFC.us) and [www.AlaskaHousingRelief.org](http://www.AlaskaHousingRelief.org)) and its application portal, allowing for translations in 108 languages. Online social engagement and digital advertising will be robust, driving awareness about the program and encouraging Alaskans to participate. Our online efforts will be monitored and adjusted as required throughout the duration of our campaign. All materials will be available for download on our website, and we'll develop additional collateral by request.

- Please explain how the program will provide culturally relevant marketing.

In addition to materials developed in their native language, AHFC will choose imagery that is culturally appropriate for the region that is targeted. AHFC will work with rural and supporting partner organizations to help disseminate program information through traditional and modern means, and we'll make all resources available on our website and provide an opportunity for the public to request additional materials.

- If your program intends to serve households who are over the 100% AMI threshold, how will your program prioritize Socially Disadvantaged Individuals?

AHFC will provide targeted communications and outreach to communities and zip codes that are known to have large proportions of Socially Disadvantaged individuals. Increasing outreach efforts in

these areas should increase the number of Socially Disadvantaged individuals who apply for HAF assistance. AHFC will track the number of applicants and recipients through the HAF portal to prioritize and ensure that the targeted proportion of Socially Disadvantaged individuals receive HAF assistance is met.

### **Performance Goals**

- Please explain how you intend to communicate your progress towards performance to the public.

AHFC will host regular debriefings with partner organizations to help disseminate program progress and performance. AHFC will also host a HAF website that will have HAF information, additional homeowner resources, and program progress and performance details that will be updated on a regular basis.

In addition to these briefings, AHFC maintains a dashboard that is updated on a weekly basis for the Emergency Rental Assistance Program. This dashboard <https://www.ahfc.us/newsroom/alaska-housing-rent-relief-weekly-program-update> includes programmatic data elements and maps outcomes by census tract and zip code. We anticipate developing similar accountability / transparency dashboards for the HAF program once it becomes operational.

- Please indicate which three metrics will serve as the best indicators of the success of your program.
1. Geographic and demographic representation of Alaskans served HAF funding.
  2. Speed and equity of funding distributed to HAF recipients by recipient income range.
  3. Number of Socially Disadvantaged Alaskans provided with HAF assistance.

- Please indicate whether you intend to disaggregate metrics by income, race, gender, etc.

Yes. The application portal will collect income, race, gender and other informative metrics that we will use for performance evaluation and reporting purposes. We analyzed these data points on a weekly basis for the Emergency Rental Assistance program to ensure no gaps developed through program outreach or service delivery and will continue to do so with the HAF.

- Please consider including as an additional metric the number of homeowners assisted/foreclosures prevented solely through counseling or legal services without payment of HAF funds to resolve the homeowner's defaults or delinquencies.

Yes. We will track referrals to counseling or legal services and request outcomes information from those agencies.

### **Readiness**

- Please provide the most recent available information about your program's readiness, including staffing, contractors, etc.

AHFC will utilize staff currently employed by AHFC. AHFC will also utilize temporary staff who are currently working on the Rental Relief Program such as call center staff. Gere Tactical is currently working as a contractor to design and maintain the online application portal.

At present, our internal AHFC resources for this program are a team of 26 temporary call center staff, 5 full time permanent staff, 6 project based staff, 3 contract staff for systems maintenance and 100+ dedicated processing team staff with our nonprofit partners.

Our Emergency Rental Assistance Program staff can be repurposed to manage the HAF program. We intend to have the same team review income eligibility and to provide support for program inquiries and escalations. The application system for the Emergency Rental Assistance was developed with the expectation that a Homeowner Module would be needed, so the infrastructure for the application intake, data management, and workflow is largely in place.

When Treasury grants us approval to move forward, we will be ready to market the program and open the application system within a matter of weeks. Our hope and goal is to be able to launch the outreach before the holiday season ends.

- Is your program prepared to launch upon approval and, if not, by what date will you be ready to launch following approval?

We anticipate that the registration portal will be ready to open by December 15<sup>th</sup>.

- Please provide updated information about your progress in spending the initial 10% payment from your jurisdiction's full allocation and the status of any pilot assistance already offered or made available to homeowners.

Alaska did not operate a HAF pilot program or spend the initial 10% payment.

#### **Budget**

No questions